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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CONTOUR IP HOLDING, LLC Plaintiff, vs. SZ DJI TECHNOLOGY CO., LTD., DJI EUROPE B.V., DJI TECHNOLOGY, INC., DJI SERVICE LLC, DJI	Case No. 2:25-CV-2182 **COMPLAINT FOR PATENT INFRINGEMENT** **DEMAND FOR JURY TRIAL**

INDUSTRIAL INC., SAIKORON LLC, and IFLIGHT TECHNOLOGY CO. LTD.

Defendants.

Complaint Filed:
Trial Date:

COMPLAINT

1. Plaintiff Contour IP Holding, LLC ("Contour" or "Plaintiff"), by its undersigned attorneys, demand a trial by jury on all issues so triable and brings this action against SZ DJI Technology Co., Ltd. ("SZ DJI"), DJI Europe B.V. ("DJI Europe"), DJI Technology, Inc. ("DJI Technology."), DJI Service LLC ("DJI Service"), DJI Industrial Inc. ("DJI Industrial"), Saikoron LLC ("Saikoron"), and iFlight Technology Co. Ltd. ("iFlight") (collectively "DJI" or "Defendants"). Contour alleges the following:

PARTIES

2. Contour is a limited liability company organized under the laws of the State of Utah with its principal place of business at 26 Patriot Place, Suite 301, Foxborough, MA 02035.

3. Upon information and belief, SZ DJI is a Chinese corporation with its principal place of business located at the 14th Floor, West Wing, Skyworth Semiconductor Design Building, No.18 Gaoxin South 4th Ave, Nanshan District, Shenzhen, China, 518057. Alternatively, DJI's website lists its headquarters at "DJI Sky City, No. 55 Xianyuan Road, Nanshan District, Shenzhen, China." Upon information and belief, SZ DJI conducts business, either directly or indirectly through its agents, on an ongoing basis in this Judicial District and elsewhere in the United States. SZ DJI's business includes, but is not limited to, the research and development of DJI-branded products imported and/or sold in the United States, including DJI's Camera Drones and/or Handheld Camera products (as defined below).

4. Upon information and belief, DJI Europe is a Netherlands corporation with

its principal place of business located at Bijdorp-Oost 6, 2992 LA Barendrecht, Netherlands. Upon information and belief, DJI Europe conducts business, either directly or indirectly through its agents, on an ongoing basis in this Judicial District and elsewhere in the United States, including but not limited to, the sale of DJI-branded products. DJI Europe's business includes, but is not limited to, the sale of DJI-branded products within the United States, including DJI's Camera Drones and other drone-related products.

5. Upon information and belief, DJI Technology is a corporation organized and existing under the laws of the State of California with its principal place of business located at 201 S. Victory Blvd., Burbank, California 91502. Upon information and belief, DJI Technology conducts business, either directly or indirectly through its agents, on an ongoing basis in this Judicial District and elsewhere in the United States and has a regular and established place of business in this Judicial District, as described below. DJI Technology's business includes, but is not limited to, marketing of DJI-branded products, including DJI's Camera Drones and Handheld Camera products. DJI Technology may be served through its registered agent, 1505 Corporation C T Corporation System, at 330 N. Brand Blvd., Ste. #700, Glendale, California 91203.

6. Upon information and belief, DJI Service is a limited liability company organized and existing under the laws of the State of California with its principal place of business located at 17301 Edwards Road, Cerritos, California 90703. Upon information and belief, DJI Service conducts business, either directly or indirectly through its agents, on an ongoing basis in this Judicial District and elsewhere in the United States and has a regular and established place of business in this Judicial District, as described below. Upon information and belief, DJI Service's business includes, but is not limited to, the sale or offer for sale of DJI-branded products, including DJI's Camera Drones and Handheld Camera products. DJI Service may be served through either of its Managers/Members, Jie Shen and Da Lu, at 1703 Edwards Road, Cerritos, California 90703.

7. Upon information and belief, DJI Industrial is a stock corporation organized and existing under the laws of the State of Delaware and is also a foreign corporation existing under the laws of the State of California. Upon information and belief, DJI Industrial's principal place of business is located at 17301 Edwards Road, Cerritos, California 90703. Upon information and belief, DJI Industrial conducts business, either directly or indirectly through its agents, on an ongoing basis in this Judicial District and elsewhere in the United States and has a regular and established place of business in this Judicial District, as described below. Upon information and belief, DJI Industrial's business includes, but is not limited to, the sale or offer for sale of DJI-branded products, including DJI's Camera Drones and Handheld Camera products. DJI Industrial may be served through its registered agent, 1505 Corporation C T Corporation System, at 330 N. Brand Blvd., Ste. #700, Glendale, California 91203.

8. Upon information and belief, Saikoron is a limited liability company organized and existing under the laws of the State of Delaware and is also a foreign limited liability company existing under the laws of the State of California. Upon information and belief, Saikoron's principal place of business is located at 17301 Edwards Road, Cerritos, California 90703. Upon information and belief, Saikoron conducts business, either directly or indirectly through its agents, on an ongoing basis in this Judicial District and elsewhere in the United States and has a regular and established place of business in this Judicial District, as described below. Upon information and belief, Saikoron formerly served as the operator of <https://store.dji.com> for the United States, through which Saikoron fulfilled DJI's online orders within the United States, but has since been replaced by DJI Service in the operation of <https://store.dji.com>. Upon information and belief, the website <https://store.dji.com> facilitates the sale or offer for sale of DJI-branded products, including DJI's Camera Drones and Handheld Camera products. Service of process for

Saikoron may be made on its registered agent, Sequoia Group CPAS, A Professional Corporation, at 33 E. Valley Blvd., Ste. 205, Alhambra, California 91801.

9. Upon information and belief, iFlight is a Chinese corporation with its principal place of business located at Units 915-916, 9/F, Building 16W, Science Park West Avenue, Phase Three, Hong Kong Science Park, Pak Shek Kok, New Territories, Hong Kong. Upon information and belief, iFlight is DJI's ultimate parent company and conducts business, either directly or indirectly through its agents, on an ongoing basis in this Judicial District and elsewhere in the United States. Upon information and belief, iFlight's business includes contracting with DJI subsidiaries to sell DJI-branded products to its subsidiaries within the United States. iFlight contracts with DJI's United States entities and other DJI subsidiaries to place DJI-branded products within the stream of commerce, and does so with the knowledge that its DJI-branded products will enter the stream of commerce within the United States.

JURISDICTION AND VENUE

10. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. §§ 1, *et seq*.

11. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

12. DJI is subject to this Court's specific and general personal jurisdiction due to its substantial business in this forum.

13. The Court has personal jurisdiction over Defendants DJI Technology, DJI Service, DJI Industrial, and Saikoron because these Defendants are California entities that are based in California and repeatedly conduct business in California and this District.

14. The Court also has personal jurisdiction over Defendants SZ DJI, DJI Europe, and iFlight because these Defendants have minimum contacts with this forum and within this Judicial District. Further, this Court has personal jurisdiction over these

Defendants because these Defendants have at the very least committed the tort of patent infringement within California and this Judicial District.

15. This Court has personal jurisdiction over all Defendants based on the relationship between the Defendants' forum contacts and Contour's claims. Defendants have purposely availed themselves of the privilege of conducting activities in this forum by: (1) operating DJI Internet websites, (i) https://store.dji.com and (ii) https://www.dji.com, which are both available to and accessed by users, customers, and potential customers of DJI within this Judicial District; (2) sold and offered to sell DJI-branded products, including, but not limited to, DJI's Camera Drones and Handheld Camera products; (3) transacted business within the State of California; (4) actively infringed and/or induced infringement in the State of California by placing infringing products into the stream of commerce through an established distribution channel with full awareness that substantial quantities of the products have been shipped into the State of California; (5) established regular and systematic business contacts within the State of California; and (6) continued to conduct such business in California through the sale of DJI's Camera Drone Products, Camera Drone Accessories, Handheld Camera Products, and Handheld Camera Accessories (as defined below). Accordingly, this Court's jurisdiction over the Defendants comports with the constitutional standards of fair play and substantial justice and arises directly from the Defendants' purposeful minimum contacts with the State of California. In addition to Defendants' purposefully availing themselves to this forum, Contour's claims arise out of or relate to Defendants' forum-related activities as described below.

16. Upon information and belief, the Court also has personal jurisdiction over Defendants because Defendants and their authorized retailers (*i.e.*, those acting on Defendants' behalf) committed and continue to commit acts of infringement in this Judicial District. As stated above, Defendants conduct business within the State of California and in this Judicial District and have committed acts of infringement within the State of California and this Judicial District. Such business includes, without

limitation, Defendants' operation of the Internet website, https://www.dji.com, in which users, customers, and potential customers may view advertisements and marketing of infringing products and accessories, and otherwise interact with DJI support resources. Further, Defendants' operation of https://www.dji.com facilitates the sale of Defendants' infringing products by directing users, customers, and potential customers to DJI's online store, https://store.dji.com, as well as by directing users, customers, and potential customers to DJI's other official online stores, resellers/retail stores, and other various dealers within this jurisdiction, as is detailed at https://www.dji.com/where-to-buy/.

17. In addition to Defendants' own online store at https://store.dji.com, Defendants have placed their infringing products in the stream of commerce in this Judicial District by selling or offering for sale their infringing products through the following channels, knowing that the infringing products will enter, be used, sold and/or offered for sale within the United States:

18. First, Defendants have official online stores with Amazon and eBay, each of which users, customers, and potential customers may purchase infringing products within this Judicial District.

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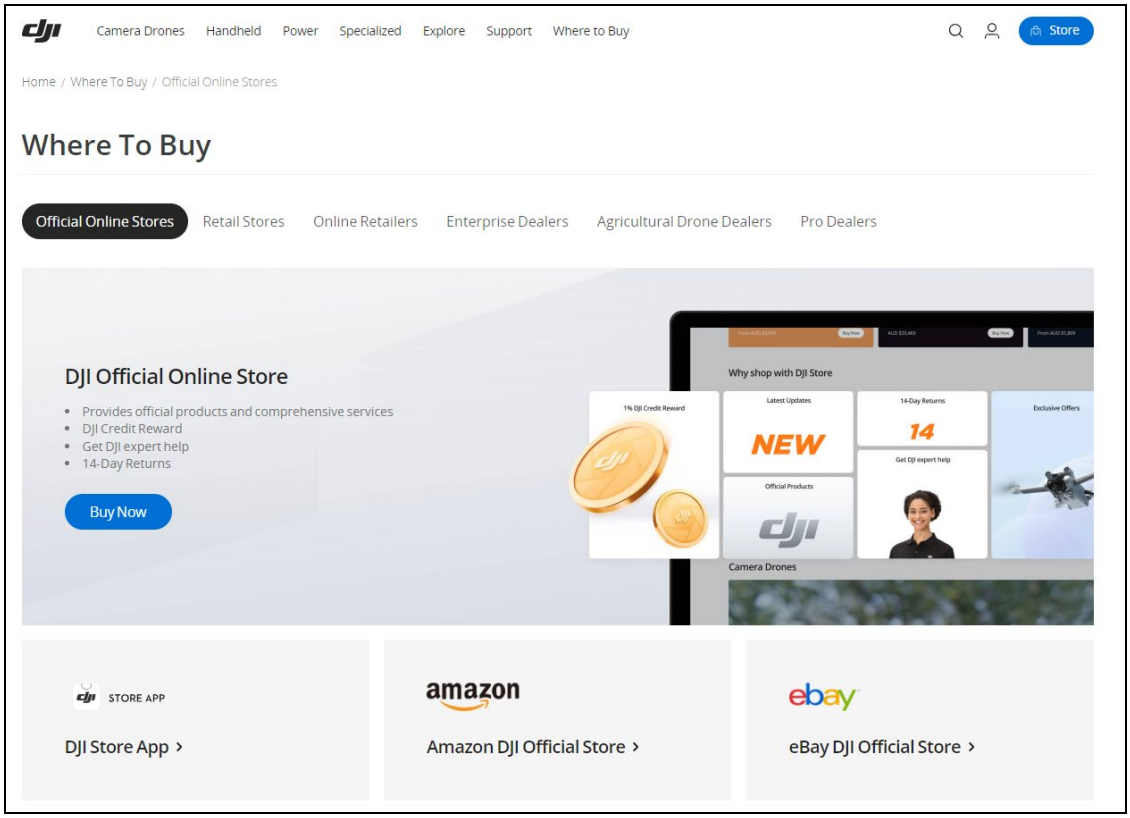

See e.g., https://www.dji.com/where-to-buy/online-stores (DJI advertising Amazon and eBay as "DJI Official Store[s]").

19. Second, Defendants engage with a numerous and wide array of retail stores which sell and offer to sell DJI-branded infringing products including, but not limited to, DJI Camera Drone Products and Handheld Camera Products within this Judicial District. Such resellers/retail stores include, among others, the Apple Store, Best Buy, Sam's Club, and Walmart.

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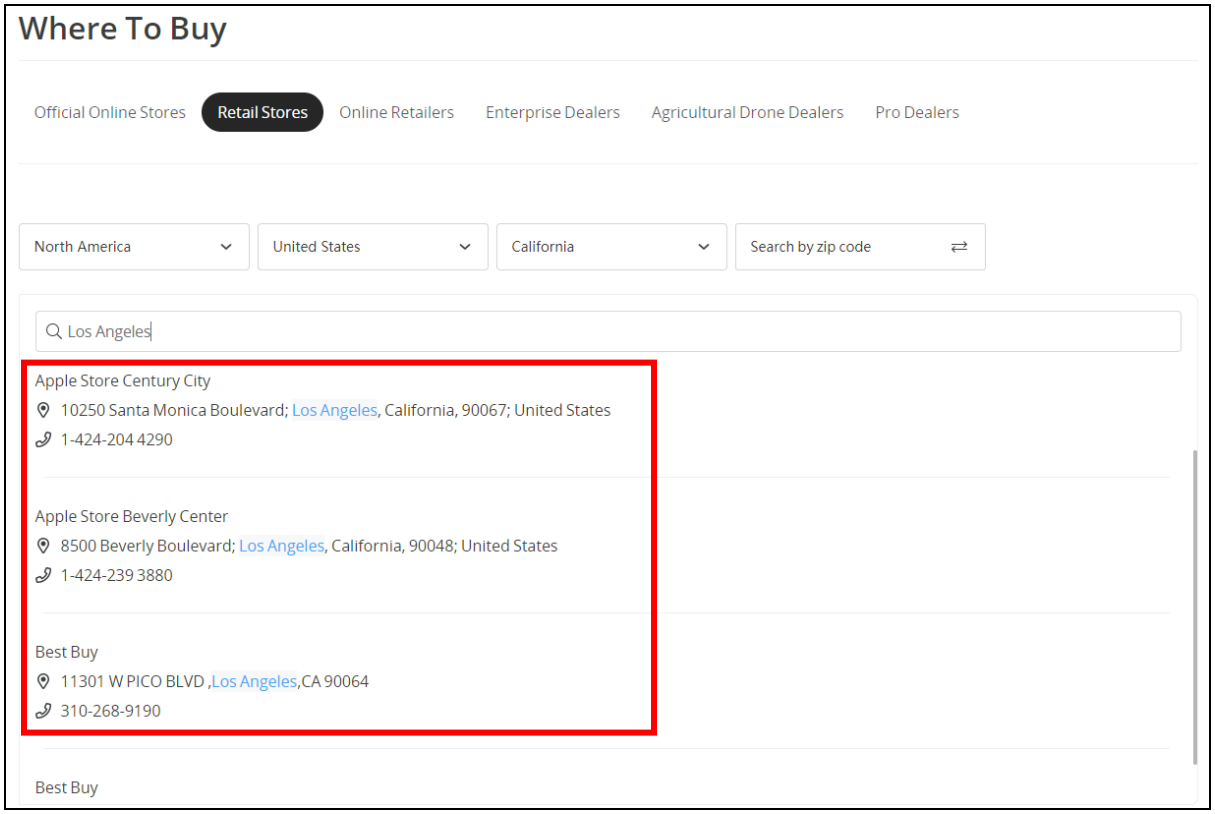
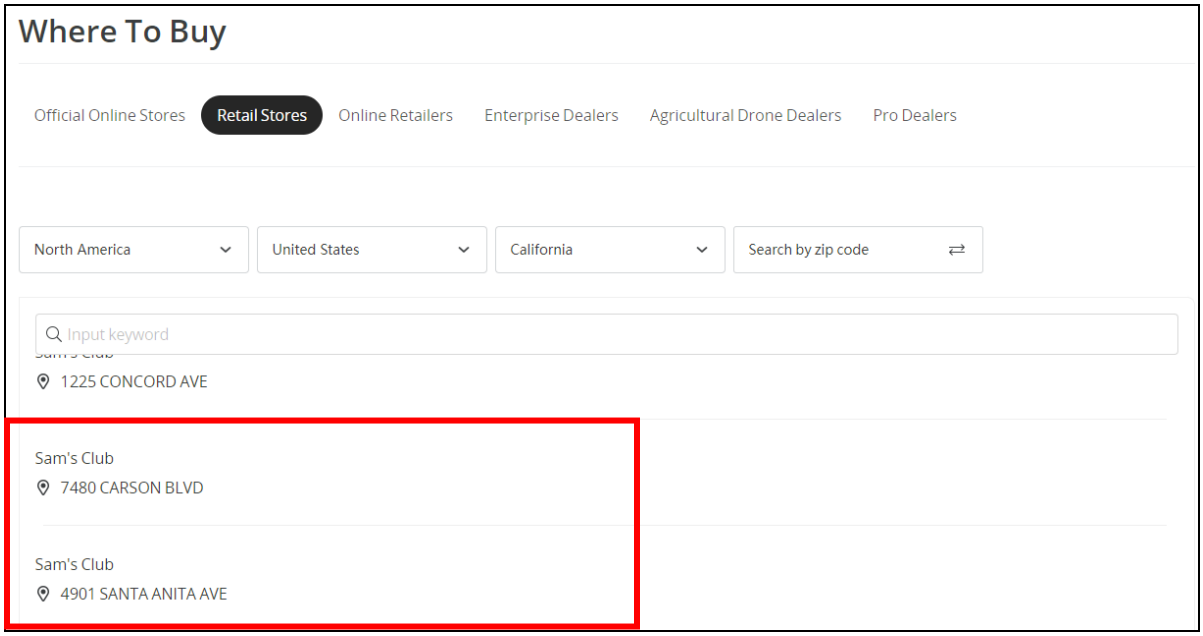
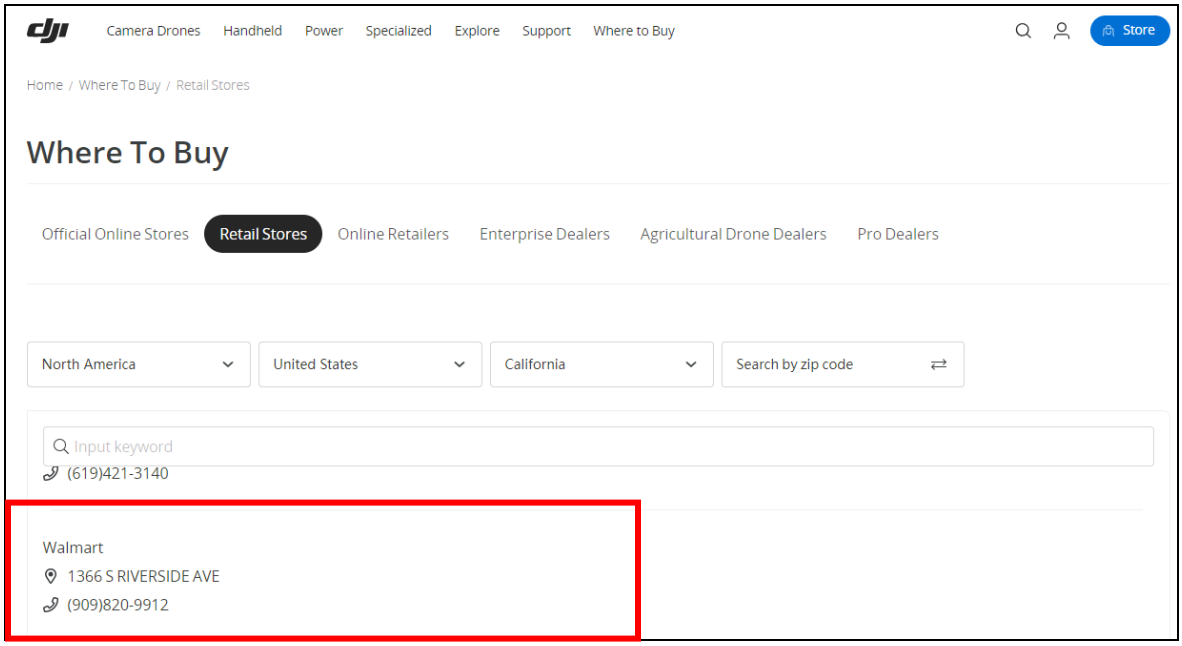


See e.g., https://www.dji.com/where-to-buy/retail-stores (DJI advertises the Apple Store and Best Buy in Los Angeles County, California, as DJI resellers/retailers).



See e.g., https://www.dji.com/where-to-buy/retail-stores (DJI advertises Sam's Clubs in Los Angeles County, California, as DJI resellers/retailers).



See e.g., https://www.dji.com/where-to-buy/retail-stores (DJI advertises the Walmart in San Bernardino County, California, as a DJI reseller/retailer).

20. Third, Defendants have at least ten online retailers. These retailers and dealers sell and offer to sell DJI-branded infringing products including, but not limited to, DJI Camera Drones and Handheld Camera Products within this Judicial District.

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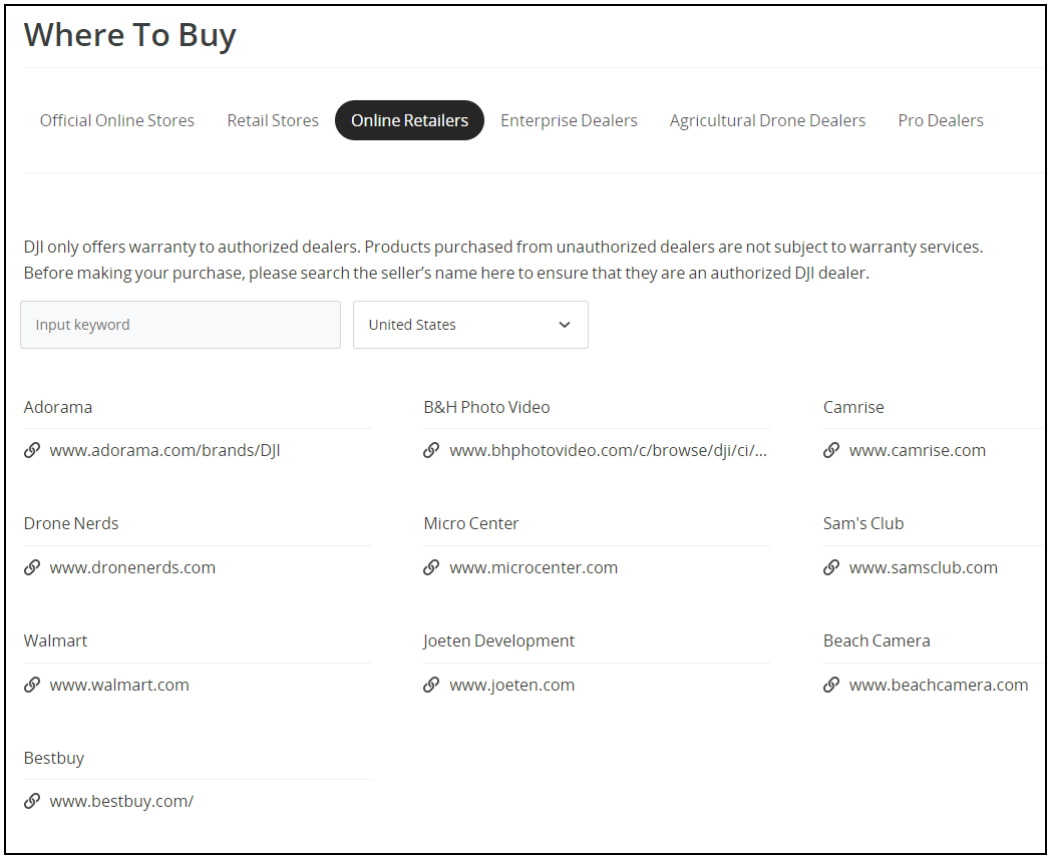

See e.g., https://www.dji.com/where-to-buy/online-retails (A list of online retailers DJI classifies as "Online Retailers").

21. Fourth, Defendants have at least 64 enterprise dealers, with at least five having addresses in the State of California. Upon information and belief, DJI's enterprise dealers sell and offer to sell DJI-branded products including, but not limited to, DJI Camera Drone Products and Handheld Camera Products within this Judicial District.

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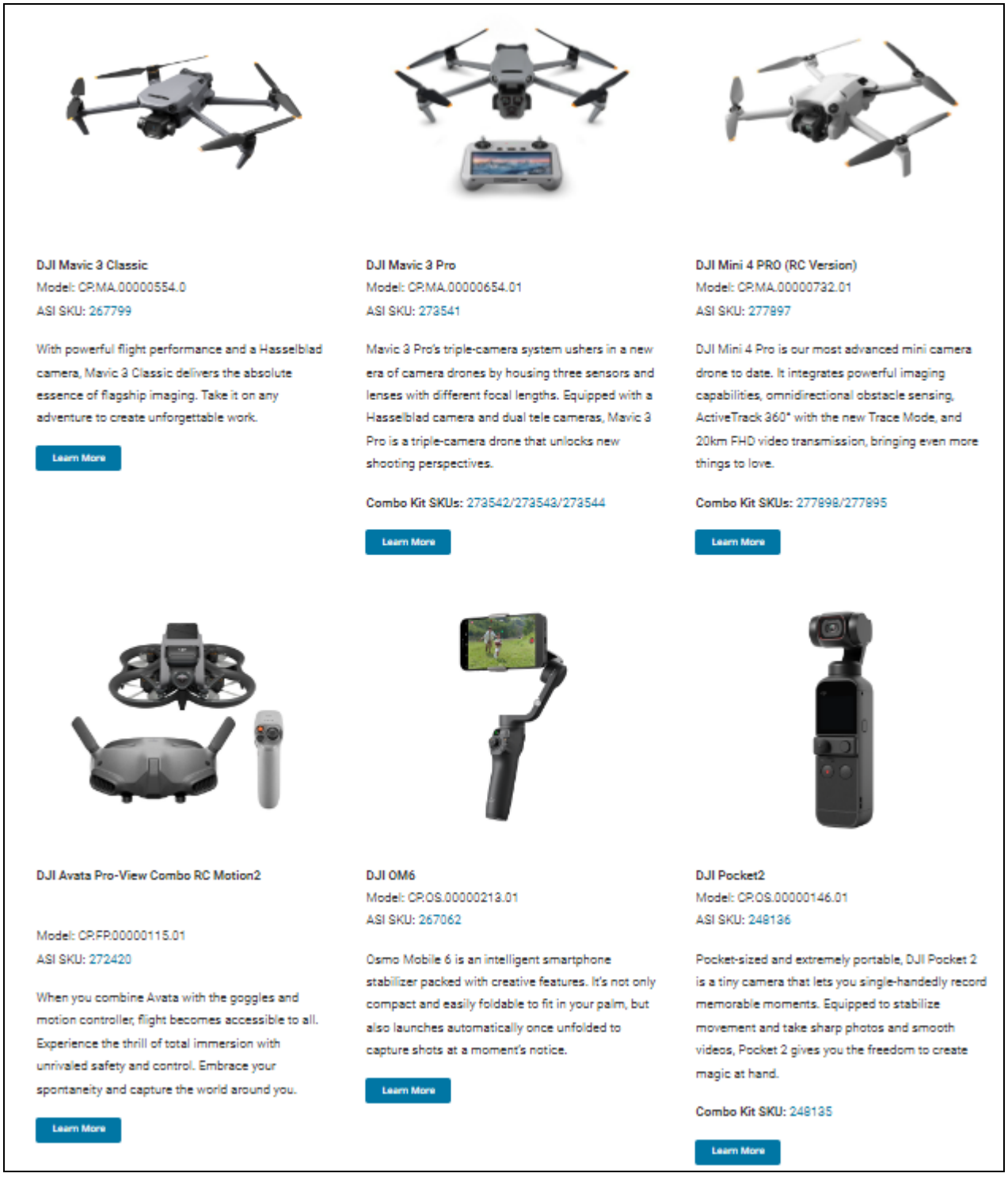

See e.g., https://www.asipartner.com/partners/dji/dji-consumer-products/ (One of DJI's Los Angeles enterprise dealers, ASI Computer Technologies, Inc, sells and offers for sale DJI's Camera Drone Products and Handheld Camera Products).

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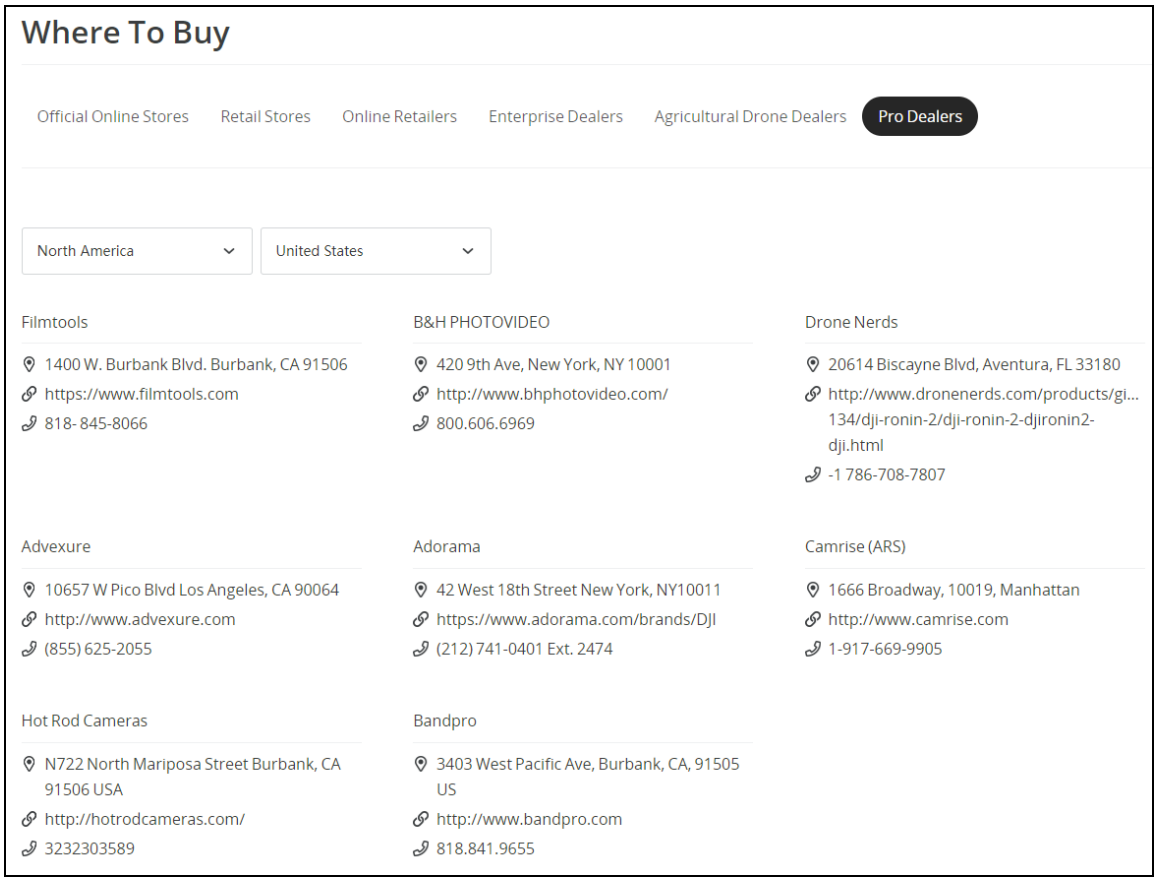
22. Fifth, Defendants have at least eight professional dealers, with at least four having addresses listed in this Judicial District. Upon information and belief, DJI's professional dealers sell and offer to sell DJI-branded products to users, customers, and potential customers of DJI within this Judicial District.



See e.g., https://www.dji.com/where-to-buy/professional-dealers (A list of online retailers DJI classifies as "Pro Dealers").

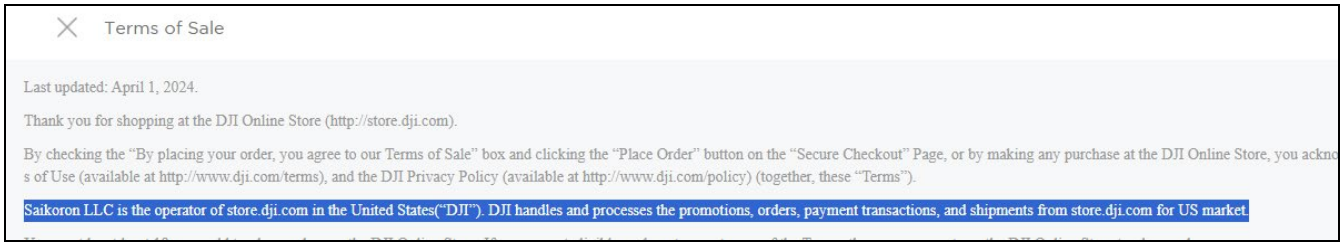
23. DJI manufactures the infringing products knowing that such products will enter, be used in, sold and/or offered for sale within the United States. For example, DJI websites are tailored to specific regions, including the United States. Further, DJI's product user manuals are provided in numerous languages, including English, and are directed toward the United States. Additionally, the product updates and revisions

described within such manuals expressly describe support for requirements within the United States.

24. Venue is proper in this Judicial District under 28 U.S.C. § 1391(b) and (c) and 28 U.S.C. § 1400(b) based upon information and belief that Defendants: (1) reside in this Judicial District; (2) have regular and established places of business in this Judicial District and are currently infringing and/or inducing acts of infringement within this forum by importing, advertising, marketing, making, using, selling, or offering to sell products, including infringing products, in this Judicial District; or (3) are a foreign entity that does not reside in any judicial district and thus may be sued in any judicial district.

25. As stated in the paragraphs above and incorporated herein, DJI Technology and DJI Industrial are both entities incorporated within the State of California and are therefore, for purposes of venue, considered residents within this Judicial District. 28 U.S.C. § 1400(b).

26. As stated in the paragraphs above and incorporated herein, DJI Service and Saikoron are unincorporated entities with regular and established places of business in this Judicial District and are currently committing acts of infringement here. Upon information and belief, Saikoron operated DJI's online store, and fulfilled orders within the United States generated through DJI's online store. Similarly, DJI Service also is an operator of DJI 's online store and fulfills orders within the United States.


Terms of Sale

Last updated: April 1, 2024.

Thank you for shopping at the DJI Online Store (http://store.dji.com).

By checking the "By placing your order, you agree to our Terms of Sale" box and clicking the "Place Order" button on the "Secure Checkout" Page, or by making any purchase at the DJI Online Store, you ackno
s of Use (available at http://www.dji.com/terms), and the DJI Privacy Policy (available at http://www.dji.com/policy) (together, these "Terms").

Saikoron LLC is the operator of store.dji.com in the United States("DJI"). DJI handles and processes the promotions, orders, payment transactions, and shipments from store.dji.com for US market.

See e.g., DJI's Terms of Sale (listing Saikoron LLC as "the operator of store.dji.com in the United States . . . .").

> Last updated: January 6, 2025
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> Thank you for shopping at the DJI Online Store (http://store.dji.com).
>
> By checking the "By placing your order, you agree to our Terms of Sale" box and clicking the "Place Order" button on the "Secure Checkout" Page, or by making any purchase at the DJI Online Store, you acknowledge that you have read, understood, and agreed to be bound by the following terms and conditions, DJI Website Terms of Use (available at http://www.dji.com/terms), and the DJI Privacy Policy (available at http://www.dji.com/policy) (together, these "Terms").
>
> DJI Service LLC is the operator of store.dji.com in the United States("DJI"). DJI handles and processes the promotions, orders, payment transactions, and shipments from store.dji.com for US market.

See e.g., DJI's Terms of Sale (listing DJI Service as operator).

27. On information and belief, both Saikoron and DJI Service fulfilled the same role for DJI, have the same registered agents, and have the same principal address filed with the Secretary of State in California. Accordingly, Saikoron and DJI Service should be treated similarly for purposes of establishing venue because these entities appear to be alter egos of one another. Regardless, venue is proper with respect to both Saikoron and DJI Service because both have regular and established places of business in this District and both have committed acts of infringement here by, at least, selling or offering to sell the products accused of infringement identified herein.

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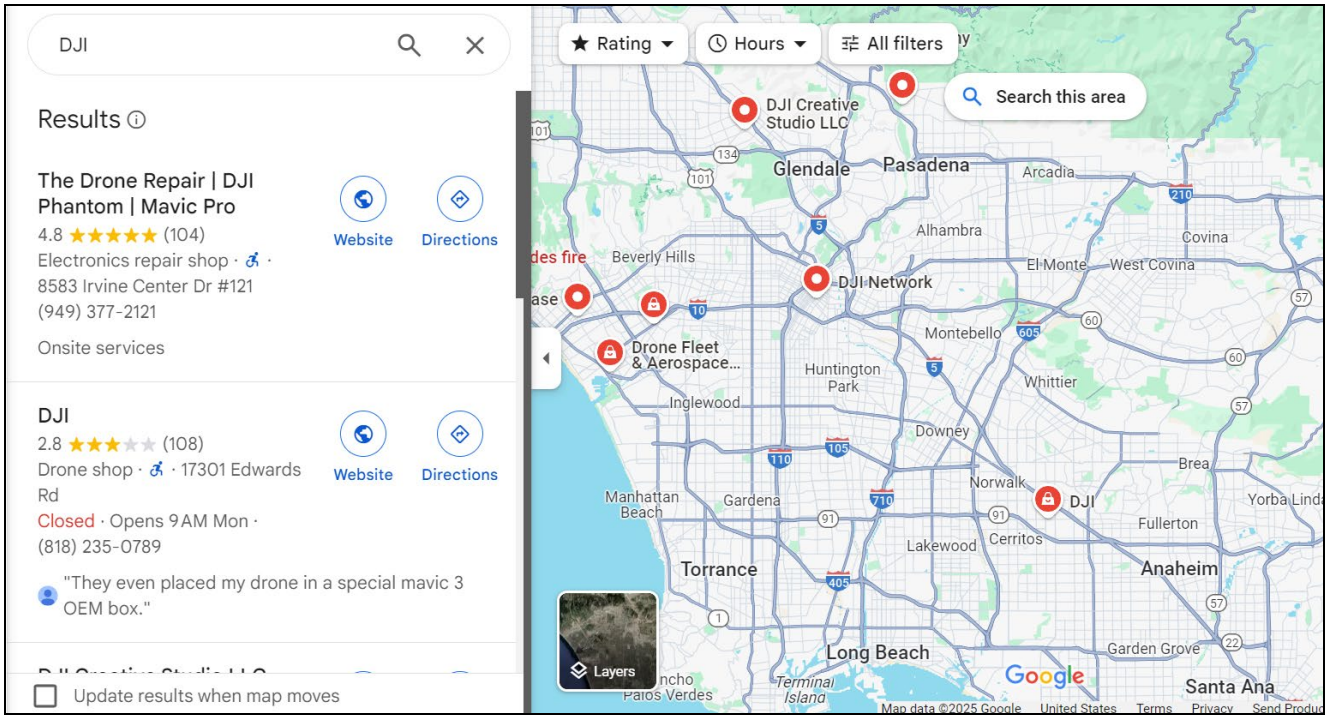
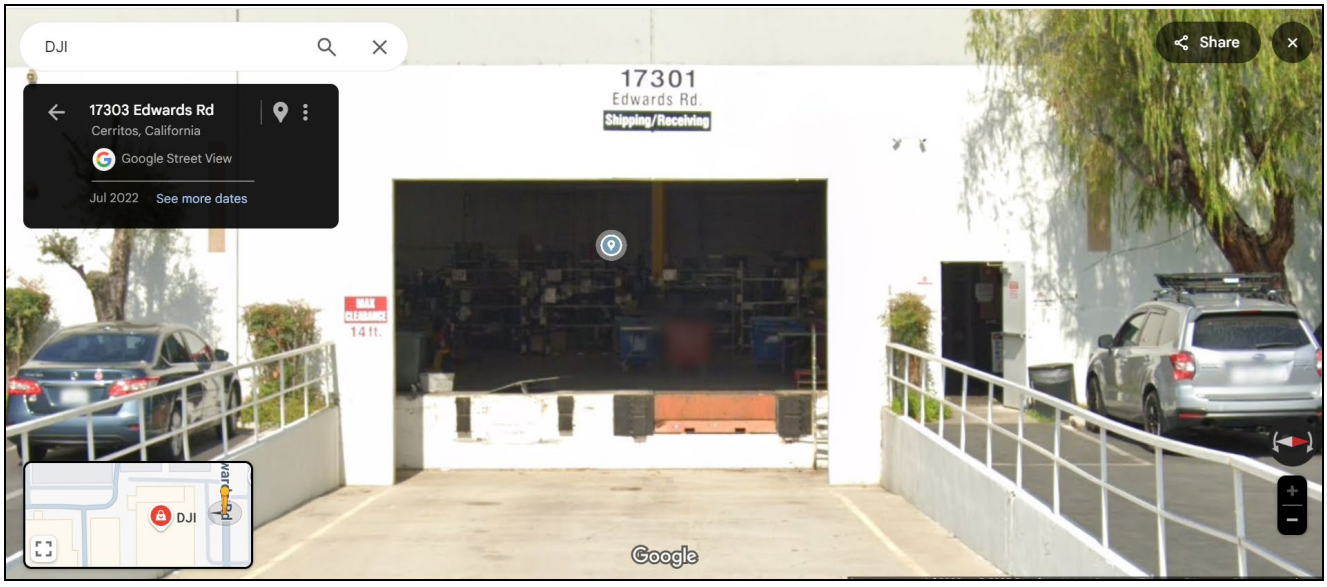


See e.g., https://www.google.com/maps/search/DJI/@33.9971419,-118.3230893,10.21z?entry=ttu&g_ep=EgoyMDI1MDEyMi4wIKXMDSoASAFQAw%3D%3D (The location of DJI Service and Saikoron in Cerritos, California).



See e.g., https://www.google.com/maps/@33.8744329,-118.0344916,3a,15y,269.67h,89.04t/data=!3m7!1e1!3m5!1suO-oR2jFyBkgKkLdUEs4aA!2e0!6shttps:%2F%2Fstreetviewpixels-pa.googleapis.com%2Fv1%2Fthumbnail%3Fcb_client%3Dmaps_sv.tactile%26w%3D9

00%26h%3D600%26pitch%3D0.9638098776777184%26panoid%3DuO-oR2jFyBkgKkLdUEs4aA%26yaw%3D269.6713753104713!7i16384!8i8192?entry=ttu&g_ep=EgoyMDI1MDEyMi4wIKXMDSoASAFQAw%3D%3D (A picture of DJI Service's building in Cerritos, California).

28. Upon information and belief, to conduct business, DJI employs a number of individuals within this Judicial District. For example, DJI invites individuals to apply for open positions through its website. Among these ads are openings for employment at DJI's locations in Burbank and Cerritos.

29. As stated in the paragraphs above and incorporated herein, SZ DJI, DJI Europe, and iFlight each do not reside in any judicial district within the United States and therefore may be sued in any judicial district.

ASSERTED PATENTS

30. Contour is the owner and the assignee of U.S. Patent No. 8,896,694 (the "'694 Patent"), entitled "Portable Digital Video Camera Configured for Remote Image Acquisition Control and Viewing." Contour has ownership of all substantial rights in the '694 Patent, including the right to exclude others and to enforce, sue, and recover damages for past and future infringement. A true and correct copy of the '694 Patent is attached as **Exhibit A**. Claims 1 and 3 are representative examples of the claims asserted in the '694 Patent.

31. Claim 1 of the '694 Patent reads as follows:

A point of view digital video camera system, comprising:

> an integrated hands-free portable viewfinderless video camera, the video camera including a lens and an image sensor, the image sensor capturing light propagating through the lens and representing a scene to be recorded, and the image sensor producing real time video image data of the scene without displaying the scene to a user of the video camera, wherein the real time video image data of the scene relates to

an activity in which the user of the video camera is about to engage, the video camera comprising:

a camera processor for receiving the video image data directly or indirectly from the image sensor, and

a wireless connection protocol device operatively connected to the camera processor to send real time video image content by wireless transmission directly to and receive control signals or data signals by wireless transmission directly from a wireless connection-enabled controller, wherein

the camera processor is configured to:

generate the video image content simultaneously at a first resolution and at a second resolution, the video image content at the first resolution and the second resolution corresponding to the video image data representing the scene to be recorded, wherein the first resolution is lower than the second resolution,

stream the real time video image content at the first resolution using the wireless connection protocol device to the wireless connection-enabled controller without displaying the video image content at the video camera,

receive the control signals for adjusting image capture settings of the video camera,

adjust the image capture settings of the video camera prior to recording the scene, and

in response to a record command, cause the video image content at the second resolution to be stored at the video camera;

a mounting interface coupled to the video camera;

a mount configured to be mounted to the body, a garment, or a vehicle of the user of the video camera, the mount configured to receive the

mounting interface for rotatably mounting the camera on the body, the garment, or the vehicle of the user of the video camera, the mounting interface and the mount further configured for manual adjustment of the video camera with respect to the user of the video camera; and

the wireless connection-enabled controller for controlling the video camera, the controller comprising executable instructions for execution on a personal portable computing device operable by a user of the personal portable computing device, wherein when executed, the executable instructions cause the personal portable computing device to:

receive video image content at the first resolution directly from the video camera,

display the video image content at the first resolution on a display of the portable computing device for adjustment of the image capture settings prior to the user of the video camera recording the activity, the video image content at the first resolution comprising a preview image of the scene which is not recorded on the camera or the personal portable computing device, the preview image allowing the user of the video camera to manually adjust an angle of the video camera with respect to the user of the video camera, and

generate the control signals to the wireless connection protocol device on the video camera to allow the user of the personal portable computing device to remotely adjust the image capture settings prior to the video camera recording the activity, wherein the control signals comprise at least one of frame alignment, multi-camera synchronization, remote file access, data acquisition, and

resolution setting adjustment and at least one of lighting setting adjustment, audio setting adjustment, and color setting adjustment.

32. Claim 3 of the '694 Patent reads as follows:

A point of view digital video camera system, comprising:

a hands-free compact portable video camera, comprising:

a lens,

an image sensor configured to capture light propagating through the lens and representing a scene, and produce real time video image data of the scene,

a camera processor for receiving the video image data directly or indirectly from the image sensor, and

a wireless connection protocol device operatively coupled to the processor and configured to send video image content by wireless transmission directly to and receive control signals or data signals by wireless transmission directly from a personal portable computing device executing an application;

a mounting interface coupled to the video camera for mounting the video camera to a user of the video camera; and

a camera mount configured to be mounted to at least one of the body, a garment, and a vehicle of the user of the video camera, the camera mount configured to couple to the mounting interface to mount the video camera on at least one of the body, the garment, and the vehicle of the user of the video camera, wherein the camera mount is further configured for manual adjustment of the video camera with respect to the user of the video camera,

wherein the camera processor is configured to:

generate first video image content and second video image content corresponding to the video image data representing the scene,

wherein the second video image content is a higher quality than the first video image content,

cause the wireless connection protocol device to send the first video image content directly to the personal portable computing device for display on a display of the personal portable computing device,

wherein the first video image content comprises a preview image of the scene, the preview image allowing the user of the video camera to manually adjust an angle of the video camera with respect to the user of the video camera, and

wherein the personal portable computing device generates the control signals for the video camera based at least in part on input received from a user of the personal portable computing device, wherein the control signals comprise at least one of a frame alignment, multi-camera synchronization, remote file access, data acquisition, and a resolution setting, and at least one of a lighting setting, a color setting, and an audio setting,

receive, prior to a recording of the scene, the control signals from the personal portable computing device for adjusting one or more image acquisition settings of the video camera in accordance with input received at the personal portable computing device, and

based at least in part on a record command, cause the second video image content to be stored in a storage device at the video camera.

33. The ’694 Patent is valid, enforceable, and was duly and legally issued on November 25, 2014, in full compliance with Title 35 of the United States Code.

34. Contour is the owner and the assignee of U.S. Patent No. 8,890,954 (the “’954 Patent”), entitled “Portable Digital Video Camera Configured for Remote Image Acquisition Control and Viewing.” Contour has ownership of all substantial rights in the ’954 Patent, including the right to exclude others and to enforce, sue and recover

damages for past and future infringement. A true and correct copy of the '954 Patent is attached as **Exhibit B**. Claim 11 is a representative example of the claims asserted in the '954 Patent.

35. Claim 11 of the '954 Patent reads as follows:

A portable, point of view digital video camera, comprising:

a lens;

an image sensor configured to capture light propagating through the lens and representing a scene, and produce real time video image data of the scene;

a wireless connection protocol device configured to send real time image content by wireless transmission directly to and receive control signals or data signals by wireless transmission directly from a personal portable computing device executing an application; and

a camera processor configured to:

receive the video image data directly or indirectly from the image sensor,

generate from the video image data a first image data stream and a second image data stream, wherein the second image data stream is a higher quality than the first image data stream,

cause the wireless connection protocol device to send the first image data stream directly to the personal portable computing device for display on a display of the personal portable computing device, wherein the personal portable computing device generates the control signals for the video camera, and wherein the control signals comprise at least one of a frame alignment, multi-camera synchronization, remote file access, and a resolution setting, and at least one of a lighting setting, a color setting, and an audio setting,

receive the control signals from the personal portable computing device, and

adjust one or more settings of the video camera based at least in part on at least a portion of the control signals received from the personal portable computing device.

36. The '954 Patent is valid, enforceable, and was duly and legally issued on November 18, 2014, in full compliance with Title 35 of the United States Code.

37. Contour is the owner and the assignee of U.S. Patent No. 12,206,983 (the "'983 Patent"), entitled "Portable Digital Video Camera Configured for Remote Image Acquisition Control and Viewing." Contour has ownership of all substantial rights in the '983 Patent, including the right to exclude others and to enforce, sue and recover damages for past and future infringement. A true and correct copy of the '983 Patent is attached as **Exhibit C**. Claim 1 is a representative example of the claims asserted in the '983 Patent.

38. Claim 1 of the '983 Patent reads as follows:

A first video camera, comprising:

a lens;

an image sensor configured to generate first image data from light propagating through the lens;

at least one non-audio data sensor configured to produce first non-audio sensor data associated with the first video camera;

a wireless connection protocol device; and

a processor, comprising:

a video encoder, and

memory,

wherein the processor is configured to:

receive the first image data from the image sensor,

receive the first non-audio sensor data from the at least one non-audio

data sensor,

generate at least one encoded video data stream using the video encoder, wherein a data type of the first non-audio sensor data is different from a data type of the at least one encoded video data stream,

send, using the wireless connection protocol device, the at least one encoded video data stream by wireless transmission to a first remote computing device, wherein the first remote computing device is connected to a first data storage medium, and wherein the first remote computing device is configured to store the at least one encoded video data stream on the first data storage medium as a first file,

combine the first non-audio sensor data with the at least one encoded video data stream to form a combined video stream,

communicate at least part of the combined video stream to the memory, wherein the at least one encoded video data stream is stored as a first track and the first non-audio sensor data is stored as a second track that is distinct from the first track, and

generate time-synchronizing data,

wherein the time-synchronizing data is used to synchronize the first track with the second track,

wherein the first video camera is configured as a media server that enables access to the combined video stream.

39. The ’983 Patent is valid, enforceable, and was duly and legally issued on January 21, 2025, in full compliance with Title 35 of the United States Code.

40. The ’694, ’954, and ’983 Patents are collectively the “Patents-in-Suit” or the “Asserted Patents.”

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BACKGROUND

41. The claimed inventions of the Asserted Patents were developed in December 2009 by a team at Contour, Inc., who recognized that improvements were needed in the point-of-view (POV) camera business. For example, existing POV cameras generally lacked preview and control ability to ensure users were able to capture the perfect shot the first time. Further, existing products lacked the ability to provide quality video along with other non-video data to help capture the full experience, and to be able to remotely view and control the camera. The technological advancements claimed by the Asserted Patents allowed for features and capabilities existing POV cameras were incapable of.

42. Contour implemented the claimed inventions into its award-winning camera, the ContourGPS. In 2011, the ContourGPS was awarded the prestigious Consumer Electronics Show (CES) Innovations Award (https://www.bikeradar.com/news/contourgps-helmet-cam-lets-you-use-phone-as-viewfinder). Similarly, Notebooks.com awarded the ContourGPS and Contour mobile app the coveted Best Mobile Lifestyle Accessory of CES 2011 award (https://notebooks.com/2011/01/13/best-of-ces-2011-awards-for-notebooks-com/), CNET awarded the ContourGPS its Editor's Choice Award (https://www.cnet.com/reviews/contour-gps-hd-wearable-camcorder-camera-1400-review/), and Red Dot awarded the ContourGPS the 2011 Red Dot Production Design Award (https://www.red-dot.org/zh/project/contourgps-28132). When explaining its rationale for giving the ContourGPS and Contour mobile app its award, Notebook.com accurately captured the essence of the invention: "When it comes to capturing your life on the go it's hard to find a solution that's more versatile than the ContourGPS Camera which comes with an app that allows you to use your iPod or iPhone as a viewfinder and to adjust settings on the fly." (https://notebooks.com/2011/01/13/best-of-ces-2011-awards-for-notebooks-com/).

43. As proven by the many prestigious accolades, the claimed inventions of the '694, '954, and '983 Patents are marked improvements to existing camera design and technology. For example, some claims recite a specific solution for generating a data stream that can be wirelessly transmitted to a personal device that can allow the user to change settings of the camera and/or adjust the angle of the camera. The Asserted Patents do not merely claim a result or the mere idea of having a video image stream wirelessly sent to a portable device. Instead, they claim a specific architecture for a camera system including, among other things, a "lens," an "image sensor," a "camera processor," a "wireless connection protocol device," and a "personal portable computing device." *See*, *e.g.*, '954 Claim 11. The Asserted Patents also claim technological improvements, such as a camera processor which "generate[s] from the video image data a first . . . and a second image data stream, wherein the second image data stream is higher quality than the first," the wireless connection protocol device which "send[s] the first image data stream directly to the personal portable computing device for display," the personal portable computing device "generates the control signals for the video camera," and the processor "adjust[s] one or more settings of the video camera based . . . [on] the control signals." *See*, *e.g.*, '954 Claim 11. As another example, claim 3 of the '694 Patent teaches a "camera mount" and a "mounting interface" that is integrated into the camera. And in another example, claim 1 of the '983 Patent teaches additional innovations including integrating "non-audio data sensors" into the camera that can capture non-audio data, "combin[ing] the first non-audio sensor data with the at least one encoded video stream to form a combined video stream," "communicat[ing] at least part of the combined video stream to memory," storing the encoded video data stream "as a first track and the first non-audio sensor data as a second track," and "generat[ing] time-synchronizing data, wherein the time-synchronizing data is used to synchronize the first track with the second track." These innovations expand the utility of the camera. Indeed, these inventions allow the camera to capture video footage combined with additional data, such as GPS data, to provide

video files with additional and important context. This feature has also received public acclaim. For example, as CNET noted, ContourGPS's GPS functionality allows Contour's Storyteller software to "parse and display [GPS data] on a Google Map with an elevation graph." (https://www.cnet.com/reviews/contour-gps-hd-wearable-camcorder-camera-1400-review/). These improvements benefit diverse audiences including athletes (like skiers whose performance relies on elevation), daily vloggers who want to geotag their favorite experiences, and families looking to document where milestones occurred. Furthermore, these improvements also allow dash cams on vehicles to report additional context, such as speed and location of the vehicle, alongside a footage of an accident.

44. The claims of the Asserted Patents involve more than well-understood, routine, and conventional activities. For example, generating two video streams of different quality and wirelessly transmitting the lower quality stream from a camera to a remote computer device, along with the other claimed elements, was a novel idea that Contour invented and patented. The conventional approaches, such as after-the-fact generation of a video from a previously recorded video or streaming a higher quality video were limited by bandwidth and battery power limits, especially in the 2009 timeframe. Contour's solution allowed devices to quickly transmit lower quality videos wirelessly for previews or live video while also generating a higher quality video with contextual data as well.

45. Contour's inventions as claimed in the Asserted Patents are and have been used in innovative wearable and gear-mountable camera products sold under the Contour brand, such as the Contour+, Contour+2, and Contour 4K, and in mobile applications such as the Contour Connect app for iOS, Android, and Windows Phone.

DJI'S ACCUSED PRODUCTS

Overview of DJI Camera Drone Products

46. Defendants make, use, offer to sell, sell, and/or import camera drones that infringe claims of the Asserted Patents. Defendants' infringing camera drones include

drones in DJI's Inspire Series (DJI Inspire 3, DJI Inspire 2), DJI's Mavic Series (DJI Mavic 3 Pro, DJI Mavic 3 Classic, DJI Mavic 3, DJI Mavic 3 Cine, and DJI Mavic 2), and DJI's Mini Series (DJI Mini 4 Pro, DJI Mini 3 Pro, DJI Mini 3, DJI Mini 4K, and DJI Mini 2 SE) (collectively, "Camera Drone Products").

47. Defendants also make, use, offer to sell, sell, and/or import camera drone accessories (collectively, "Camera Drone Accessories")[1] such as propellers, propeller guards, camera lenses, camera lens filters, remote controls, remote control sticks, remote control monitor hoods, remote control strap and waist support kits, remote monitors, remote monitor adjustment tools, micro-SD cards, external storage, batteries, battery charging hubs, battery charging cables, GNSS mobile stations, kits, storage covers, drone carrying bags, and other video recording accessories that are functionally related to, and are specifically designed for use with, their Camera Drone Products.

[1] The DJI Drone Products support numerous accessories, the Camera Drone Accessories. For example, the Camera Drone Accessories include, but are not limited to the DJI Inspire 3 Foldable Quick-Release Propellers (Pair); DJI Inspire 3 Foldable Quick-Release Propellers for High Altitude (Pair); DJI Mavic 3 Series Low-Noise Propellers; DJI Mini 4 Pro/Mini 3 Pro Propellers; DJI Inspire 3 Propeller Guard; DJI Mavic 3 Pro Propeller Guard; DJI Mini 3 Series 360º Propeller Guard; DJI DL 75 mm F1.8 Lens; DJI DL 18 mm F2.8 ASPH Lens; DL 24mm F2.8 LS ASPH Lens; DL 35mm F2.8 LS ASPH Lens; DL 50mm F2.8 LS ASPH Lens; DJI Mavic 3 Pro Wide-Angle Lens; DJI DL Lens ND Filter Set; DJI Mavic 3 Pro ND Filter Set (ND8/16/32/64); DJI Mini 3 Series ND Filter Set (ND16/64/256); DJI RC Plus (Inspire 3); DJI RC; DJI RC Pro; DJI RC-N1; DJI RC Plus Height-Adjustable Control sticks; DJI RC/RC 2 Control Sticks; DJI RC-N Series Control Sticks; DJI RC Pro Control Sticks; DJI RC Plus Monitor Hood; DJI RC-N Series Remote Controller Monitor Hood; DJI RC Plus Strap and Waist Support Kit; DJI High-Bright Remote Monitor; DJI Focus Pro Hand Unit; DJI Master Wheels 3-Axis; DJI Three-Channel Follow Focus; Lexar Professional 1066x 256GB U3 A2 V30 microSDXC; Kingston Canvas Go! Plus microSD Card 64GB; Kingston Canvas Go! Plus microSD Card 128GB; Samsung 256GB Pro Plus microSD Card; SanDisk Extreme microSD Card 128GB; DJI PROSSD 1TB; DJI TB51 Intelligent Battery; WB37 Battery; DJI Mavic 3 Series Intelligent Flight Battery; DJI Mini 4 Pro Intelligent Flight Battery; DJI Mini 4 Pro/Mini 3 Series Intelligent Flight Battery Plus; DJI Mini 3 Series Intelligent Flight Battery; DJI TB51 Intelligent Battery Charging Hub; WB37 Battery Charging Hub (USB-C); DJI Power 1000 +DJI Power to SDC to DJI Inspire 3 Fast Charge Cable; DJI Power 500 + DJI Power SDC to Inspire 3 Fast Charge Cable; DJI Mavic 3 Series 100W Battery Charging Hub; DJI Mavic 3 Series Battery Charging Hub; DJI Power 1000 + DJI Power SDC to DJI Mavic 3 Series Fast Charge Cable; DJI Power 500 + DJI Power SDC to DJI Mavic 3 Series Fast Charge Cable; DJI Mini 4 Pro/Mini 3 Series Two-Way Charging Hub; DJI TB51 Intelligent Battery Charging Hub AC Cable; DJI Power SDC to DJI Inspire 3 Fast Cable Charge; DJI 100W USB-C Power Adapter; DJI 65W Car Charger; DJI 65W Portable Charger; DJI Power SDC to DJI Mavic 3 Series Fast Charge Cable; DJI D-RTK 2 High-Precision GNSS Mobile Station – Tripod; DJI D-RTK 2 High-Precision GNSS Mobile Station; DJI Mavic 3 Series Fly More Kit; DJI Mavic 3 Pro Storage Cover; DJI Convertible Carrying Bag; DJI Battery Safe Bag (Small Size); DJI Battery Safe Bag (Large Size); DJI Inspire 3 Gimbal Rubber Dampers; DJI RC-N Series RC Cable (Lighting Connector); DJI RC-N Series RC Cable (USB-C Connector); DJI RC-N Series RC Cable (Standard Micro USB Connector).

48. Additionally, Defendants also provide Android and iOS applications for use with their Camera Drones Products. The Android and iOS applications include, but are not limited to, the DJI Go App, DJI Fly App, the DJI Pilot 2 App, the DJI Assistant 2 App, and all other similar applications (collectively, "Camera Drone Applications").

Analysis of Accused DJI Camera Drone Products

49. The DJI Mini 3 Pro is a non-limiting example of an Accused Camera Drone Product that infringes at least claim 1 of the '694 Patent, claim 11 of the '954 Patent, and claim 1 of the '983 Patent. For example, the DJI Mini 3 Pro includes a portable, point of view digital video camera that is rotatably mounted to the DJI Mini 3 Pro and allows for integrated hands-free and viewfinderless video recording. The DJI Mini 3 Pro and its respective Camera Drone Accessories (the "DJI Mini 3 Pro System") form a digital video camera system.

See e.g., https://www.amazon.com/DJI-Flight-Obstacle-Sensing-Compliant/dp/B09WDBDGBZ?th=1

50. The DJI Mini 3 Pro includes a 82.1° Field of View lens; a 1/1.3-inch CMOS image sensor that captures light propagating through the lens that represents the camera's field of view to produce real time video image data of the scene to be recorded; and, a processor to, among other things, receive the video image data directly or indirectly from the image sensor, generate multiple image data streams at differing

resolutions and/or frame rates, stream the video image data to a peripheral device without displaying the scene at the video camera, receive control signals from the peripheral device, and adjust the settings of the DJI Mini 3 Pro's camera. On information and belief, the DJI Mini 3 Pro's processor is a H6M image SOC processor. The processor includes memory as well as a video encoder used to generate at least one encoded video data stream.

51. The DJI Mini 3 Pro also includes at least one non-audio data sensor that produces data associated with the video. For example, on information and belief, the DJI Mini 3 Pro non-audio sensor(s) include, but are not limited to, non-audio sensors for its Global Navigation Satellite System ("GNSS"), Vision Systems, Infrared Sensing System, Initial Measurement Unit ("IMU"), and Compass.

GNSS/Vision Systems/Infrared System:

Flight Modes

DJI Mini 3 Pro has three flight modes, plus a fourth flight mode that the aircraft switches to in certain scenarios. Flight modes can be switched via the Flight Mode switch on the remote controller.

Normal Mode: The aircraft utilizes GNSS and the Forward, Backward, and Downward Vision Systems and Infrared Sensing System to locate itself and stabilize. When the GNSS signal is strong, the aircraft uses GNSS to locate itself and stabilize. When the GNSS is weak but the lighting and other environmental conditions are sufficient, it uses the vision systems. When the Forward, Backward, and Downward Vision Systems are enabled and lighting and other environment conditions are sufficient, the maximum tilt angle is 25° and the maximum flight speed is 10 m/s.

Sport Mode: In Sport Mode, the aircraft utilizes GNSS and the Downward Vision System for positioning and the aircraft responses are optimized for agility and speed making it more responsive to control stick movements. Note that obstacle sensing is disabled and the maximum flight speed is 16 m/s.

Cine Mode: Cine mode is based on Normal mode with a limited flight speed, making the aircraft more stable during shooting.

The aircraft automatically changes to Attitude (ATTI) mode when the Vision Systems are unavailable or disabled and when the GNSS signal is weak or the compass experiences interference. In ATTI mode, the aircraft may be more easily affected by its surroundings. Environmental factors such as wind can result in horizontal shifting, which may present hazards especially when flying in confined spaces. The aircraft will not be able to hover or brake automatically, therefore the pilot should land the aircraft as soon as possible to avoid accidents.

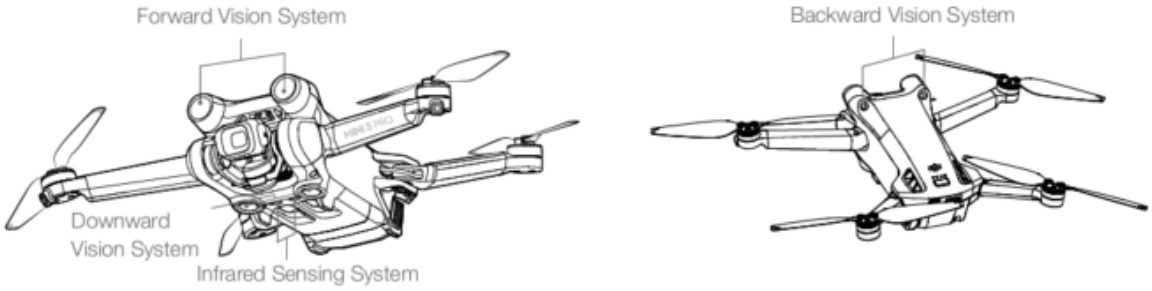
See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 13 (available at https://dl.djicdn.com/downloads/DJI_Mini_3_Pro/UM/20240105/2/DJI_Mini_3_Pro_User_Manual_v1.6_EN.pdf).

Vision Systems and Infrared Sensing Systems

DJI Mini 3 Pro is equipped with both an Infrared Sensing System and Forward, Backward, and Downward Vision Systems.

The Forward, Backward, and Downward Vision Systems consist of two cameras each.

The Infrared Sensing System consists of two 3D infrared modules. The Downward Vision System and Infrared Sensing System help the aircraft maintain its current position, hover more precisely, and to fly indoors or in other environments where GNSS is unavailable.



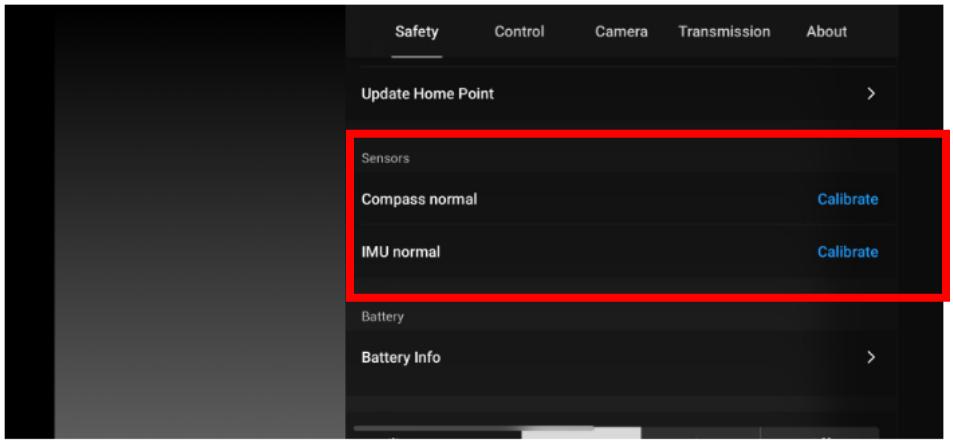
See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 18-19.

IMU/Compass:

Calibrating the IMU

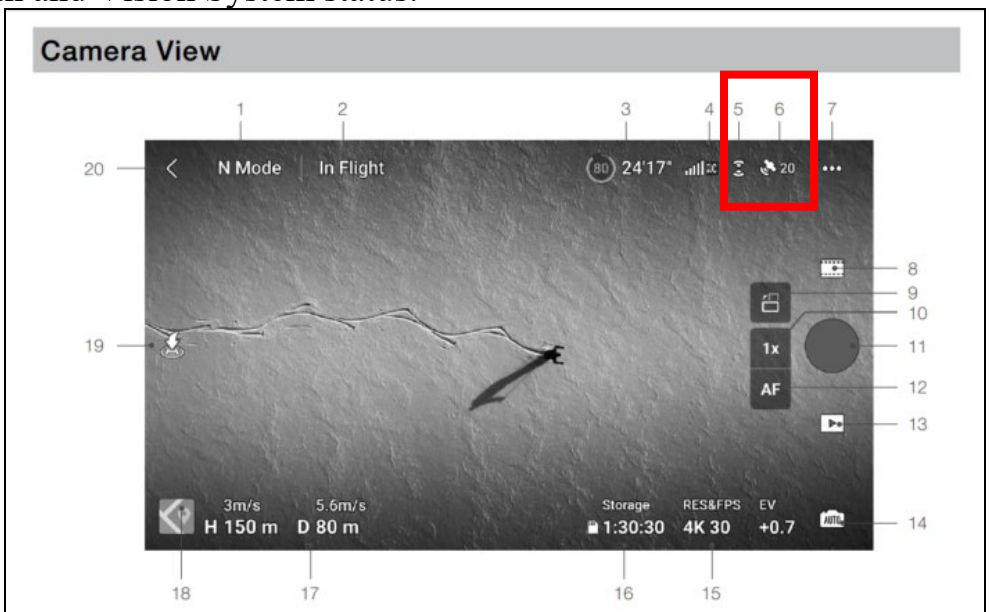
For DJI Air Series, DJI Neo, DJI Mini Series, DJI Mavic 3 Series:

Enter the flight interface in DJI Fly, tap "···" > "Safety" > "Sensor" > "IMU" > "Calibration", tap "Calibration", and follow the on-screen instructions to properly place the aircraft.



See e.g., https://support.dji.com/help/content?customId=en-us03400006763&spaceId=34&re=NL&lang=en&documentType=artical&paperDocType=paper

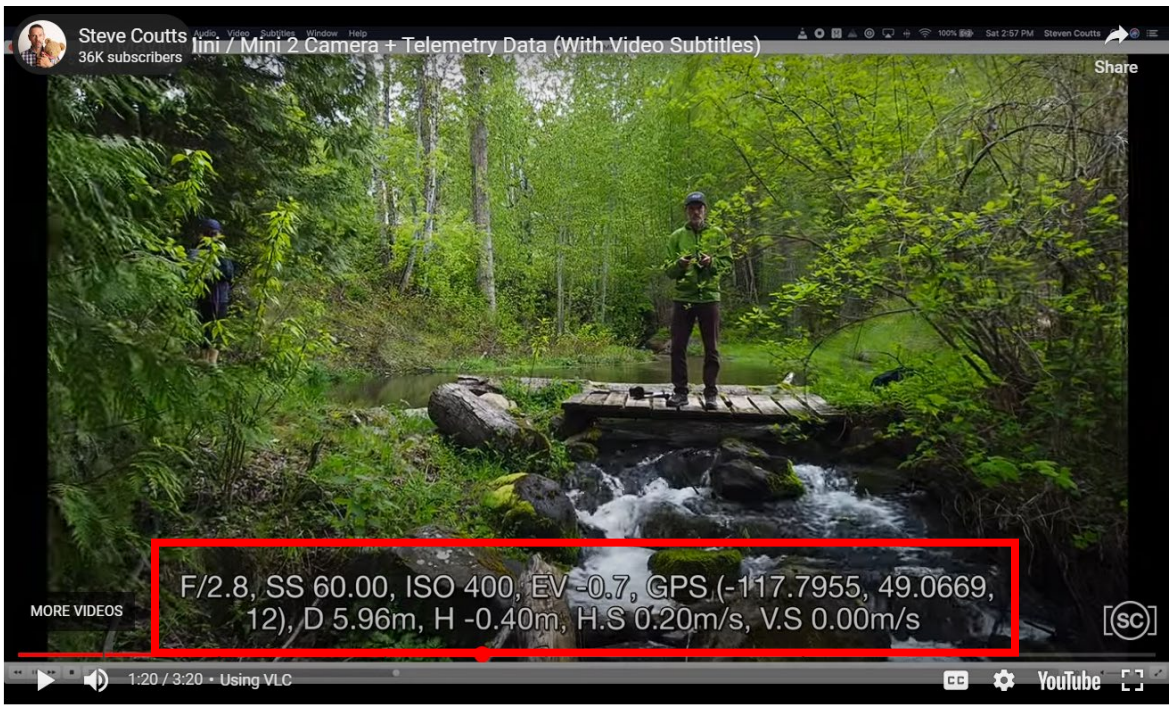
52. The DJI Mini 3 Pro's processor receives the encoded video data stream from the image sensor as well as the non-audio data from at least one of the non-audio GNSS, Vision System, Infrared System, IMU, and/or Compass sensor(s). The data received by the processor from the non-audio sensors is different than the data from the encoded video data stream. The non-audio data is then associated with the video image data of the DJI Mini 3 Pro's camera and time synchronized to the data of the video data stream. For example, the user may view real time data information pertaining to the GNSS strength and Vision System status.



1. Flight Mode
N: Displays the current flight mode.
2. System Status Bar
In Flight: Indicates the aircraft flight status and displays various warning messages. Tap to view more information when a warning prompt appears.
3. Battery Information
24'17" : Displays the current battery level and remaining flight time.
4. Video Downlink Signal Strength
RC : Displays the video downlink signal strength between the aircraft and the remote controller.
5. Vision System Status
: The upper part of the icon indicates the status of the Forward Vision System, and the lower part indicates the status of the Backward Vision System. The icon is white when the vision system is working normally and turns red when the vision system is unavailable.
6. GNSS Status
20 : Displays the current GNSS signal strength. Tap to check the GNSS signal status. The Home Point can be updated when the icon is white, which indicates the GNSS signal is strong.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 54.

The processor completes a variety of operations with the data from the different sensors. For example, the DJI Mini 3 Pro generates a MP4 file by combining multiple tracks of additional data streams with a track containing the encoded video stream. Upon information and belief, one or more of these data streams contains timecoded information including information related to camera frame rate, exposure, shutter speed, color, lens focal length, and latitude/longitude/altitude, among other information. These additional tracks are different from the track containing the video data, but are time synchronized to the video data track. The combined MP4 stream is stored in the DJI Mini 3 Pro's memory. Time synchronization of the video image data and the non-audio data can also be shown when subtitles are enabled through the DJI Fly App. On information and belief, when subtitles are enabled, the DJI Fly App populates time-synchronized non-audio data on the videos recorded by the user.



See e.g., https://www.youtube.com/watch?v=Lf9ZikB8aJ4 (The above video is representative of the subtitles generated through the DJI Fly App).

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53. The data generated by the non-audio sensors and received by the DJI Mini 3 Pro's processor enable the DJI Mini 3 Pro to capture and generate video image data that relates to an activity of the user through features like Spotlight, Point of Interest, and ActiveTrack. For example, the DJI Mini 3 Pro's Point of Interest 3.0 feature utilizes navigational coordinates generated by the non-audio sensors to track both static and moving subjects.

> **Point of Interest 3.0 (POI 3.0)**
>
> The aircraft tracks the subject in a circle based on the set radius and flight speed. The mode supports the capturing of both static and moving subjects such as vehicles and people. The maximum flight speed is 13 m/s regardless of whether the aircraft is in Normal, Sport or Cine Mode. The flight speed may be adjusted dynamically according the actual radius. Move the roll stick to circle the subject, pitch stick to alter the distance from the subject, throttle stick to change the altitude, and yaw stick to adjust the frame. Note that obstacle avoidance is disabled in POI 3.0.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 21.

54. As stated above, the DJI Mini 3 Pro's processor completes a variety of operations with the data from the different sensors. For example, the processor combines the encoded video data stream with the GNSS, Vision System, Infrared System, IMU, and Compass sensor data to form a combined MP4 or MOV data stream, which consists of multiple tracks. In that stream, the video data is in a different track than the navigational and other non-audio data. The combined MP4 or MOV files are stored in the DJI Mini 3 Pro's memory and may be accessed by the user.

Video Format	MP4/MOV (H.264/H.265)

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 68.

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> **Storing Photos and Videos**
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> DJI Mini 3 Pro supports the use of a microSD card to store your photos and videos. A microSD card with a UHS-I Speed Grade 3 rating or above is required due to the fast read and write speeds necessary for high-resolution video data. Refer to the Specifications for more information about recommended microSD cards.
>
> Photos and videos can also be saved into the internal storage of the aircraft when no microSD card is available. Use of a microSD card is recommended for large data storage.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 37.

> **Flight Recorder**
>
> Flight data including flight telemetry, aircraft status information, and other parameters are automatically saved to the internal data recorder of the aircraft. The data can be accessed using DJI Assistant 2 (Consumer Drones Series).

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 28.

55. The DJI Mini 3 Pro System further includes a wireless connection protocol device that is operatively connected to the camera processor through 802.11 a/b/g/n/ac Wi-Fi protocol. The wireless connection protocol device allows the DJI Mini 3 Pro to function as a media server by enabling the DJI Mini 3 Pro's processor to wirelessly transmit videos and other non-audio data to, and further receive control signals or data signals from, the user's personal portable device executing the DJI Fly App. The DJI Fly App can be installed on Android and Apple phone and tablet products for use with the DJI RC-N1 remote controller and must be installed to use the DJI Mini 3 Pro. Alternatively the DJI Fly App comes installed on the DJI RC Remote Controller. Collectively, and for purposes of the DJI Mini 3 Pro, the DJI RC Remote Controller and the user's mobile device paired with the DJI RC-N1 are referred to as a "Personal Portable Computing Device."

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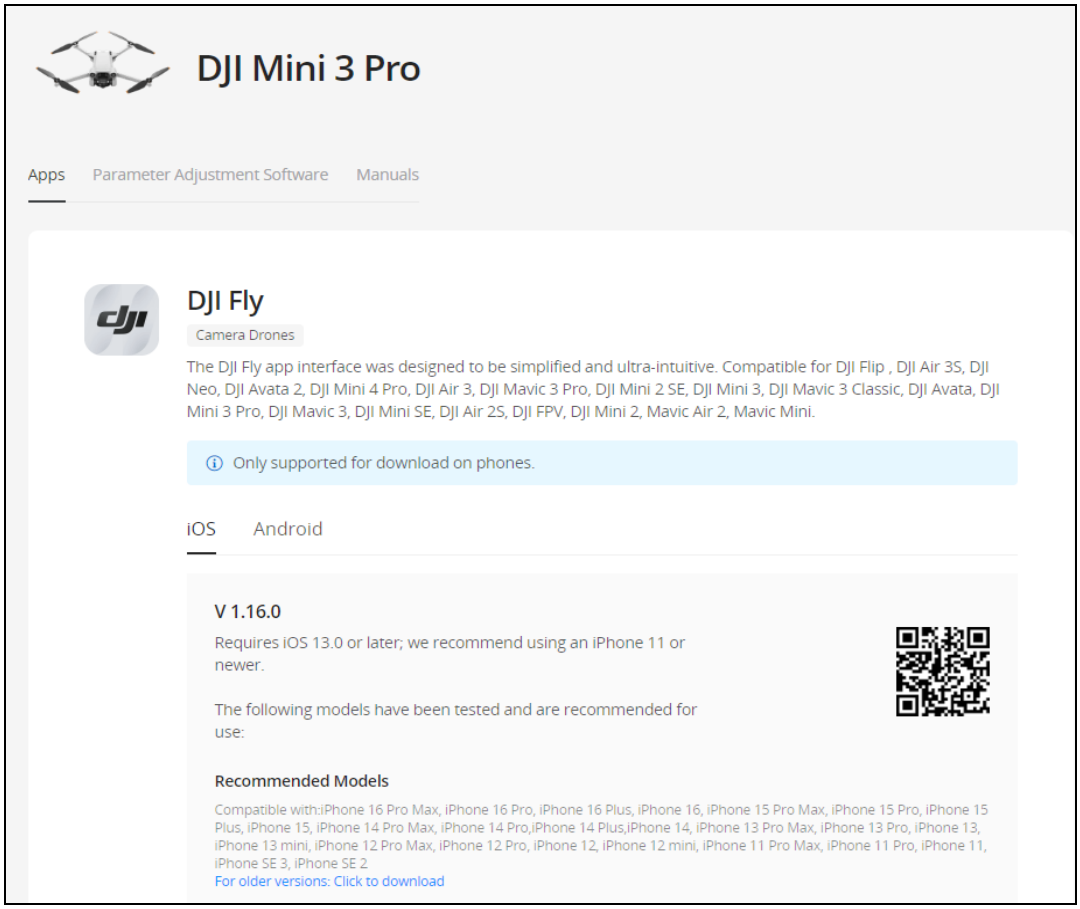


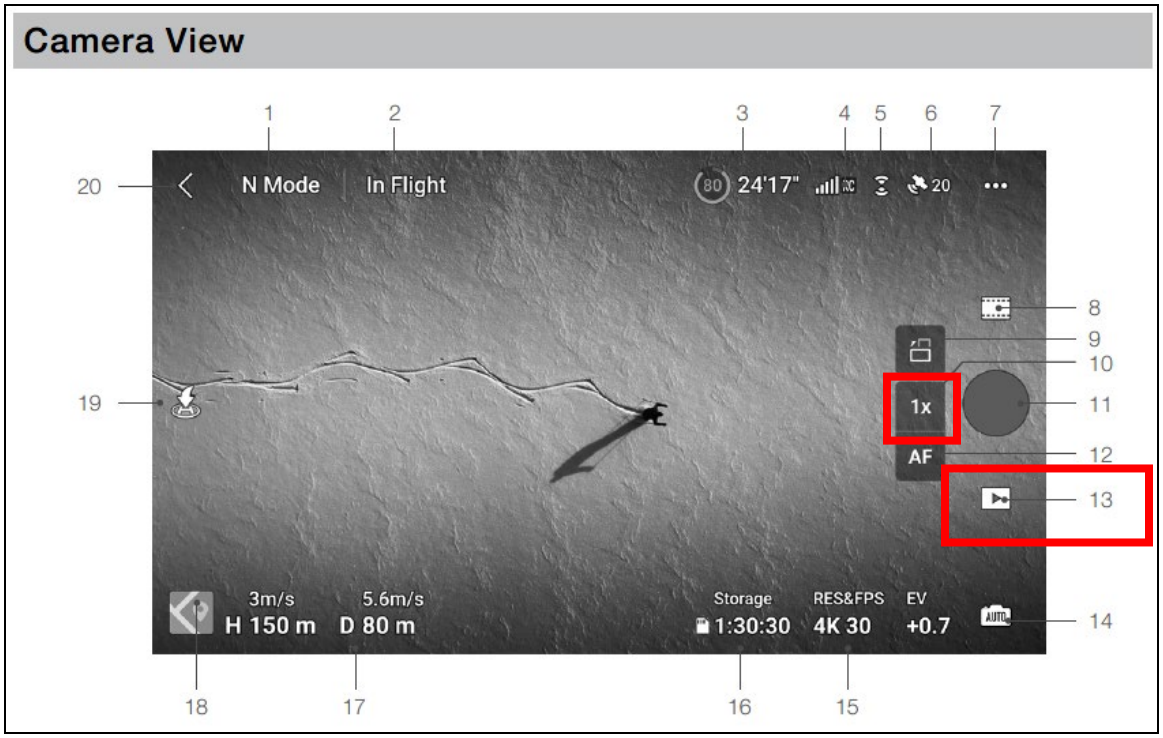
See e.g., https://www.dji.com/downloads/products/mini-3-pro#app

56. The DJI Fly App wirelessly connects with the DJI Mini 3 Pro and allows for a variety of wireless transmissions between the DJI Mini 3 Pro and the user's Personal Portable Computing Device. For example, the user can view the live video directly from the DJI Mini 3 Pro on the user's Personal Portable Computing Device. In this situation, the processor uses the wireless connection protocol device on the DJI Mini 3 Pro to directly transmit live video data from the DJI Mini 3 Pro to the user's Personal Portable Computing Device.

> • **Transmission**
> A livestreaming platform can be selected to broadcast the camera view in real time. The frequency band and channel mode can also be set in the transmission settings.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 56.

57. The DJI Fly App also allows users to wirelessly transmit captured videos and photos directly to the user's Personal Portable Computing Device. Users may also control the camera movements and other camera parameters of the DJI Mini 3 Pro through the DJI Fly App. For example, the user can enter a command on the DJI Fly App (such as zooming in on a target), and the app will wirelessly direct the DJI Mini 3 Pro to follow the user's command.



See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 54.

10. Zoom

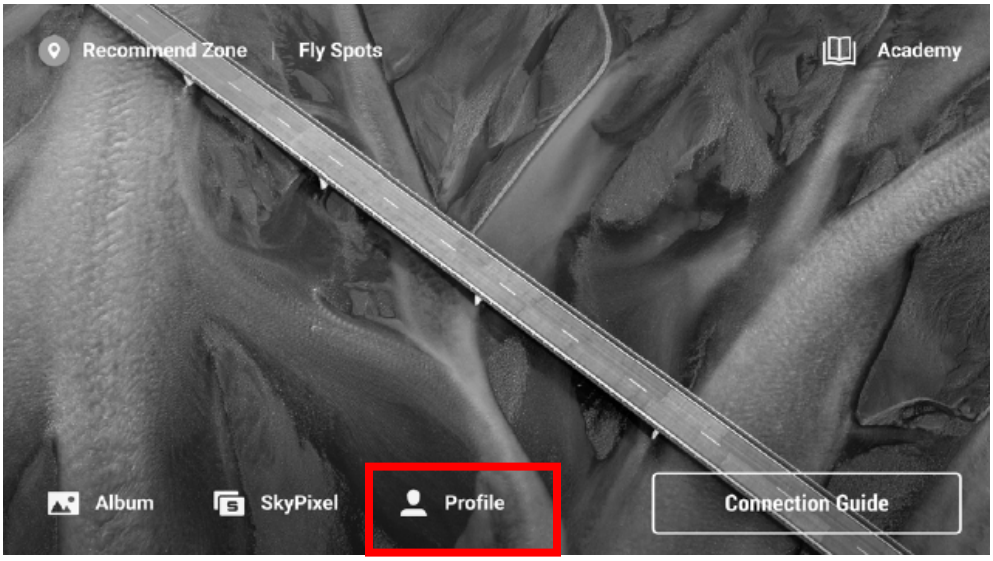
1x : The icon shows the zoom ratio. Tap to adjust the zoom ratio. Tap and hold the icon to expand the zoom bar and slide on the bar to adjust the zoom ratio.

13. Playback

: Tap to enter playback and preview photos and videos as soon as they are captured.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 56.

58. The DJI Fly App is also configured to store the encoded video data stream in both the cached memory of the Personal Portable Computing Device and in the local storage (e.g., a microSD card) of the Personal Portable Computing Device.



Profile

View account information, flight records; visit the DJI forum, online store; access the Find My Drone feature, and other settings such as firmware updates, camera view, cached data, account privacy, and language.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 69.

59. The DJI Mini 3 Pro's camera has a mounting interface that couples the camera to the DJI Mini 3 Pro's gimbal mount. The gimbal mount enables the video camera to be rotatably mounted to the vehicle of the user (i.e., the DJI Mini 3 Pro).

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See e.g., https://www.youtube.com/watch?v=OhGdNCWEuBs

See e.g., https://www.youtube.com/watch?v=OhGdNCWEuBs

60. The gimbal mount is configured to receive the mounting interface and provide the DJI Mini 3 Pro's camera with 3-axis rotation. Further, the user may manually adjust the video camera either physically or through the DJI Fly App.

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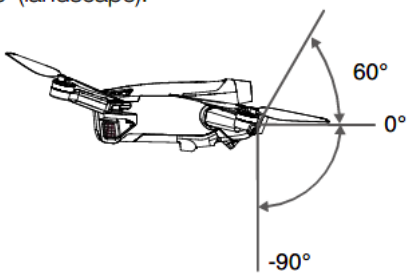
Gimbal and Camera

Gimbal Profile

The DJI Mini 3 Pro 3-axis gimbal stabilizes the camera, allowing you to capture clear and steady images and videos at high flight speed. The gimbal has a control tilt range of -90° to +60°, and two control roll angles of -90° (portrait) and 0° (landscape).



Use the gimbal dial on the remote controller to control the tilt of the camera. Alternatively, do so through the camera view in DJI Fly. Press the screen until an adjustment bar appears and drag up and down to control the camera's tilt. Tap the Landscape/Portrait Mode Switch in DJI Fly to switch between the two gimbal roll angles. The roll axis will rotate to -90° when Portrait Mode is enabled, and back to 0° in Landscape Mode.

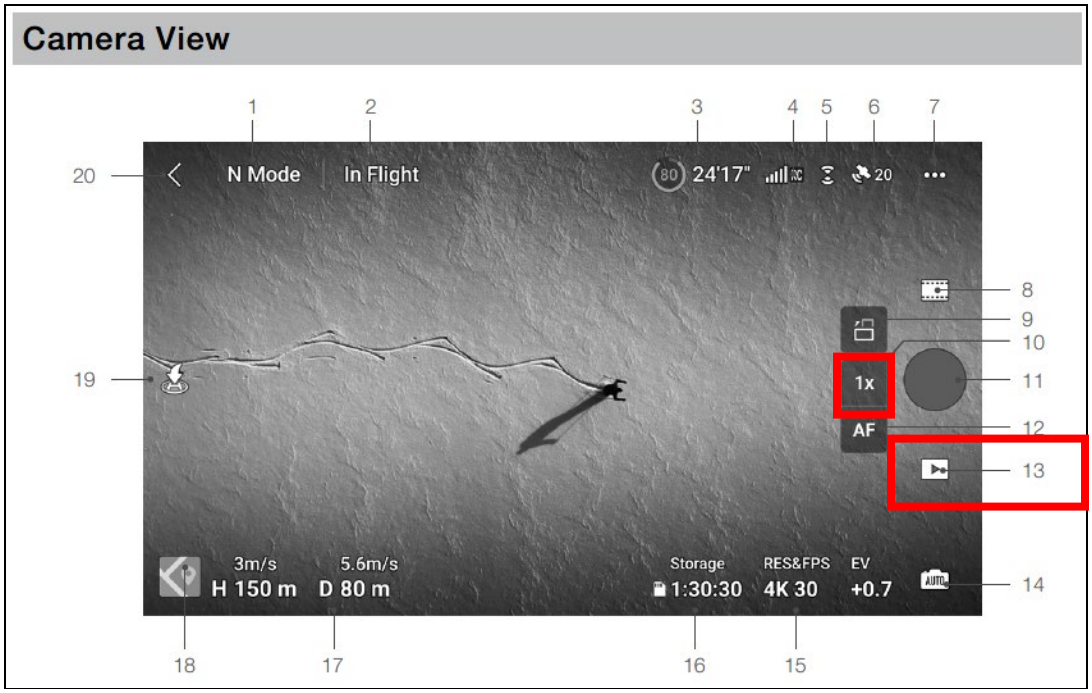
See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 56.

61. The DJI Mini 3 Pro's camera processor is configured to simultaneously generate two video streams based on what the camera is viewing. For example, the first video stream may be a livestream of the real time video captured by the camera, which is then received by and displayed on the Personal Portable Computing Device. Alternatively, the first video stream may be in the form of a playback video or a locally saved video in the Personal Portable Computing Device's cache memory. When recorded, the second video stream is automatically stored at the aircraft. The first and second video streams are substantially the same content, except that, upon information and belief, the first video stream is a lower resolution, quality, and frame rate than the second video stream.

62. When executed on the user's Personal Portable Computing Device, the DJI Mini 3 Pro's livestream is a preview of the DJI Mini 3 Pro's current view and a preview of the higher resolution/quality video that the DJI Mini 3 Pro can record. Through the control signals generated in DJI Fly App's livestream preview, the user

can remotely adjust the control signals that control the DJI Mini 3 Pro based on the user's input(s). These control signals may be adjusted either prior to or during the recording of the scene. These signals include, but are not limited to:

63. Frame Alignment – Among other settings, the user can rotate the 3-axis gimbal to align the frame with a subject. The user can also adjust the zoom of the camera through the DJI Fly App.



10. Zoom

1x : The icon shows the zoom ratio. Tap to adjust the zoom ratio. Tap and hold the icon to expand the zoom bar and slide on the bar to adjust the zoom ratio.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 54.

64. Remote File Access - Through the DJI Fly App, the user can access files saved through the playback feature or may utilize QuickTransfer to access remote files.

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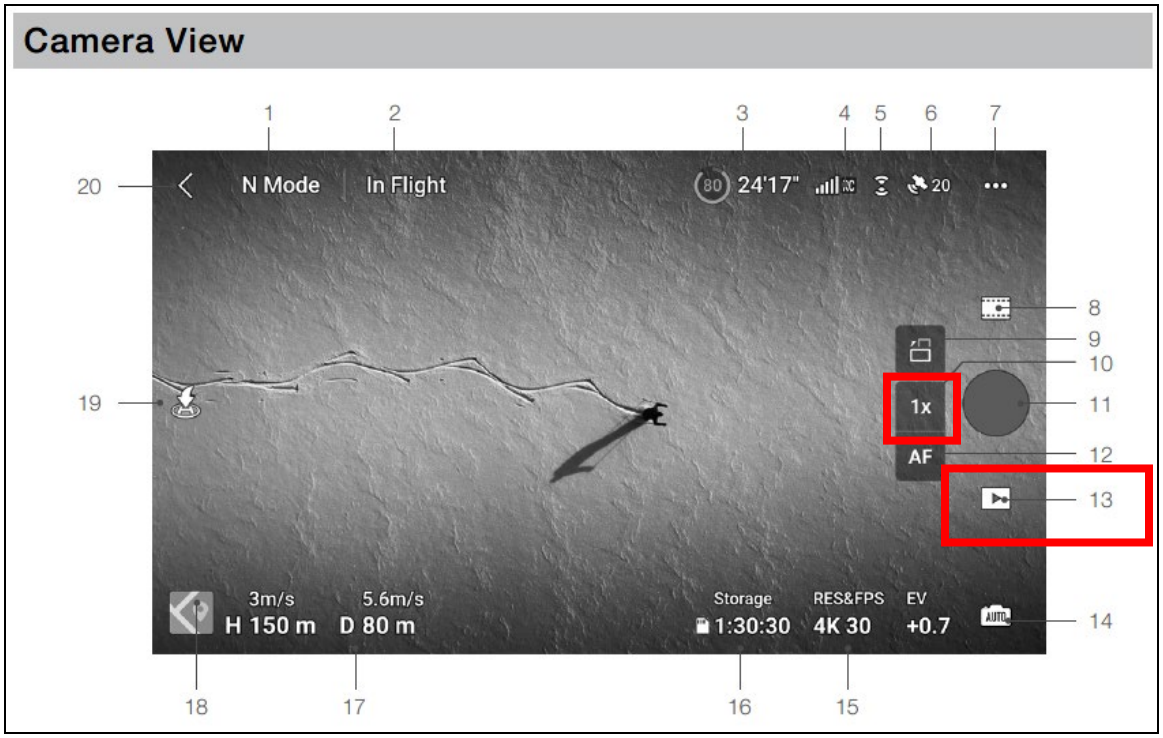


13. Playback

▶ : Tap to enter playback and preview photos and videos as soon as they are captured.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 54.

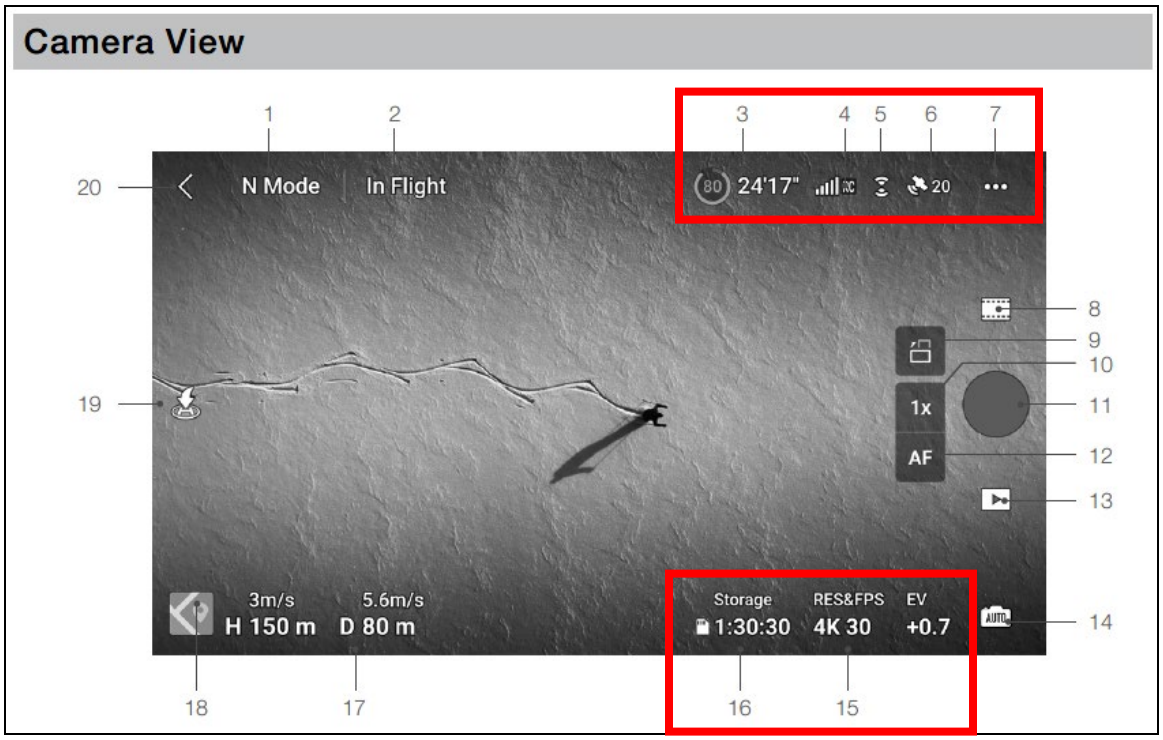
QuickTransfer

DJI Mini 3 Pro can connect directly to mobile devices via Wi-Fi, enabling users to download photos and videos from the aircraft to the mobile device through DJI Fly without using the DJI RC-N1 remote controller. Users can enjoy faster and more convenient downloads with a transmission rate of up to 25 MB/s.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 14.

65. Data Acquisition and Resolution - The user can use the preview on the DJI Fly App to acquire key data like DJI Mini 3 Pro's battery level, Video Downlink Signal Strength, Vision System Status, GNSS Status, and available storage in the DJI Mini 3 Pro's microSD card (for example, identified in the subsequent picture as #3, #4, #5, #6, and #16, respectively). The user can also modify the recorded video's resolution (for example, identified in the subsequent picture as #15).

66. Color/Lighting - The DJI Fly App allows the user to send control signals from the user's Personal Portable Computing Device to the DJI Mini 3 Pro. These settings include the ability to manipulate the following settings (for example, identified in the subsequent picture as #7): the color of the displayed and recorded video, and the lighting of the displayed and recorded video (as well as in #15).



See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 54.

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3. Battery Information

(80) **24'17"** : Displays the current battery level and remaining flight time.

4. Video Downlink Signal Strength

RC : Displays the video downlink signal strength between the aircraft and the remote controller.

5. Vision System Status

: The upper part of the icon indicates the status of the Forward Vision System, and the lower part indicates the status of the Backward Vision System. The icon is white when the vision system is working normally and turns red when the vision system is unavailable.

6. GNSS Status

20 : Displays the current GNSS signal strength. Tap to check the GNSS signal status. The Home Point can be updated when the icon is white, which indicates the GNSS signal is strong.

7. System Settings

System settings provide information about safety, control, the camera, and transmission.

- Safety

Flight Assistance: Forward and Backward vision systems are enabled after setting Obstacle Avoidance to Bypass or Brake. The aircraft cannot sense obstacles if Obstacle Avoidance is disabled. The aircraft cannot fly left or right if Sideways Flight is disabled.

Radar Map Display: When enabled, the real-time obstacle detection radar map will be displayed.

Flight Protection: Tap to set the max altitude and the max distance for flights.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 54.

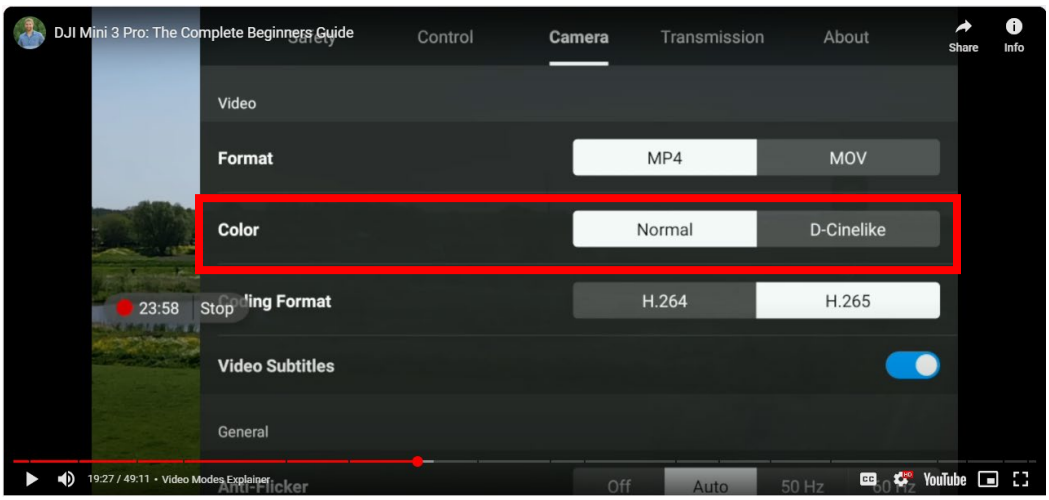
15. Shooting Parameters

RES&FPS EV
4K 30 **+0.7** : Displays the current shootings parameters. Tap to access parameter settings.

16. microSD Card Information

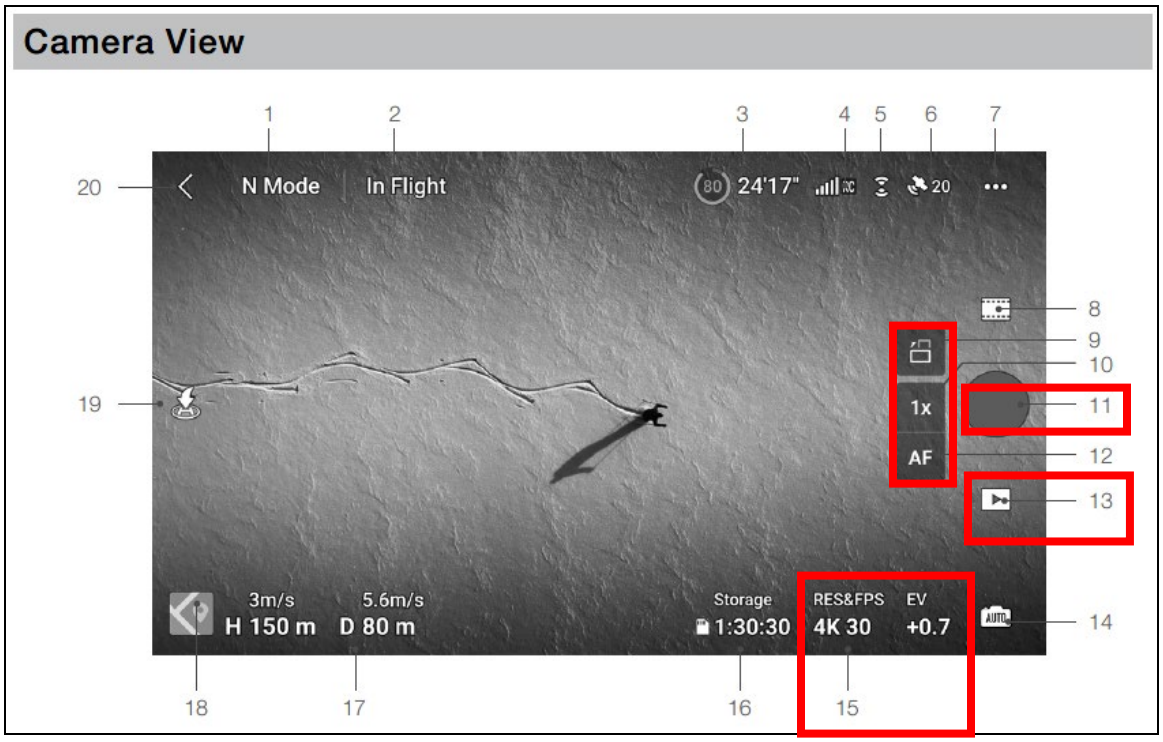
Storage
1:30:30 : Displays the remaining number of photos or video recording time on the current microSD card. Tap to view the available capacity of the microSD card.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 57.



See e.g., https://www.youtube.com/watch?v=gNXGb8cZumY

67. Prior to recording, the user can modify video quality or capture settings in the DJI Fly App livestream on their Personal Portable Computing Device (for example, identified in the subsequent picture as #9, #10, #12, or #15). The DJI Mini 3 Pro will adjust its settings in response to the modifications the user made on the DJI Fly App. The user can also command the DJI Mini 3 Pro to record the higher quality video on the DJI Mini 3 Pro's microSD card or internal storage by clicking the red record button in DJI Fly App's livestream (for example, identified in the subsequent picture as #11). The user can view the higher quality video in an MP4 or MOV format either on the DJI Mini 3 Pro, or on the user's Personal Portable Computing Device via the DJI Fly App (for example, identified in the subsequent picture as #13).



See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 54.

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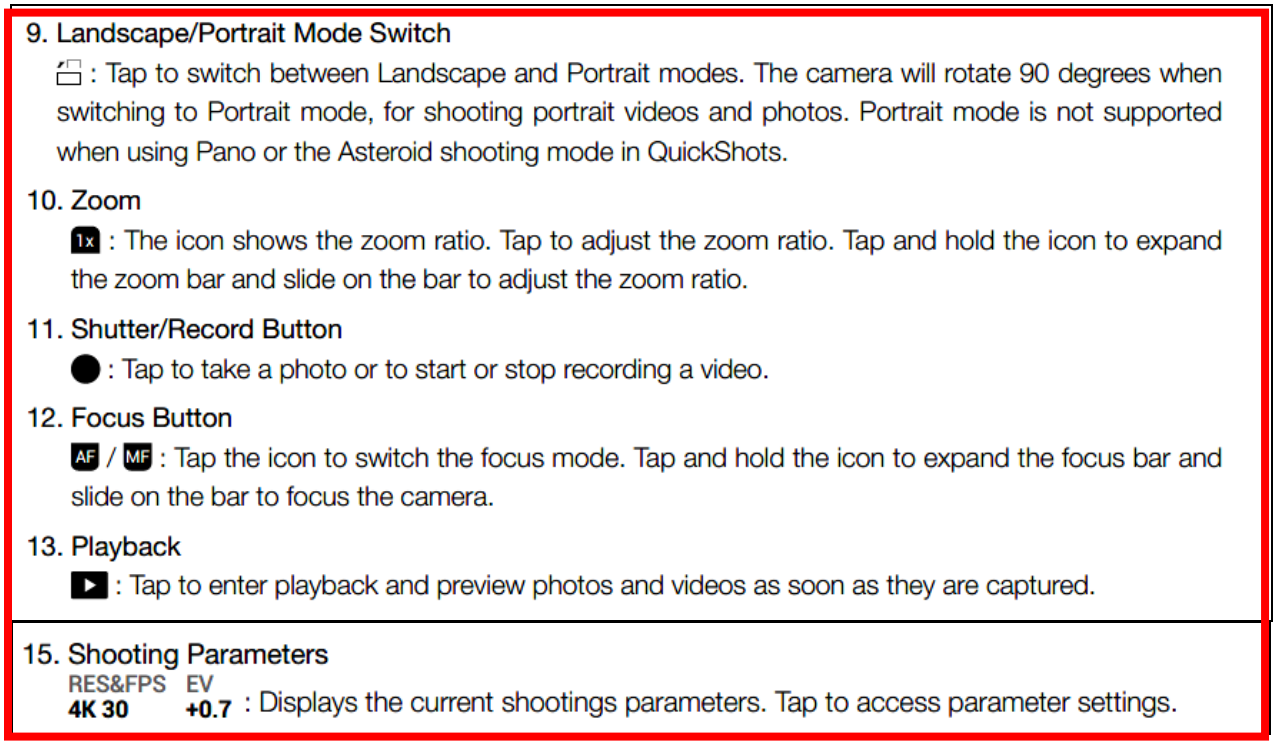


9. Landscape/Portrait Mode Switch

: Tap to switch between Landscape and Portrait modes. The camera will rotate 90 degrees when switching to Portrait mode, for shooting portrait videos and photos. Portrait mode is not supported when using Pano or the Asteroid shooting mode in QuickShots.

10. Zoom

1x : The icon shows the zoom ratio. Tap to adjust the zoom ratio. Tap and hold the icon to expand the zoom bar and slide on the bar to adjust the zoom ratio.

11. Shutter/Record Button

: Tap to take a photo or to start or stop recording a video.

12. Focus Button

AF / MF : Tap the icon to switch the focus mode. Tap and hold the icon to expand the focus bar and slide on the bar to focus the camera.

13. Playback

: Tap to enter playback and preview photos and videos as soon as they are captured.

15. Shooting Parameters

RES&FPS EV
4K 30 +0.7 : Displays the current shootings parameters. Tap to access parameter settings.

See e.g., DJI Mini 3 Pro User Manual v1.6 EN at 56-57.

Overview of DJI Handheld Camera Products

68. Defendants also make, use, offer to sell, sell, and/or import handheld cameras that infringe claims of the Asserted Patents. Defendants' infringing handheld cameras include cameras in DJI's Osmo Action line (Osmo Action, DJI Action 2, Osmo Action 3, Osmo Action 4, and Osmo Action 5 Pro), and DJI's Osmo Pocket line (DJI Pocket 2, and Osmo Pocket 3) (collectively, "Handheld Camera Products").

69. Defendants also make, use, offer to sell, sell, and/or import handheld camera accessories (collectively, "Handheld Camera Accessories")[2] such as mounts, mounting components, grips, tripods, microSD cards, and video recording accessories

[2] The DJI Handheld Cameras support numerous accessories, the Handheld Camera Accessories. For example, the Handheld Camera Accessories include, but are not limited to the its camera mounting implementations (Osmo Action Bite Mount; Osmo Backpack Strap Mount; Osmo Action Hanging Neck Mount; Osmo Action Bike Seat Rail Mount; Osmo Action Handlebar Mount; Osmo Action Chest Strap Mount; Osmo Action Surfing Tether; Osmo Action Biking Accessory Kit; Osmo Action Suction Cup Mount; Osmo Action Helmet Chin Mount; Mini Handlebar Mount; 360° Wrist Strap; Flat Adhesive Base; Osmo Action Chin Mount Clip; Osmo Flexible Mount; Osmo Mini Tripod; DJI Pocket 2 Micro Tripod; DJI Action 2 Remote Control Extension Rod; Osmo Action Mini Extension Rod; and Osmo Pocket 3 Expansion Adaptor).

that are functionally related to, and are specifically designed for use with, their Handheld Camera Products.

70. Additionally, Defendants also provide Android and iOS applications for use with their Handheld Camera Products. The Android and iOS applications include, but are not limited to, the DJI Mimo App and all other similar applications (collectively, "Handheld Camera Applications").

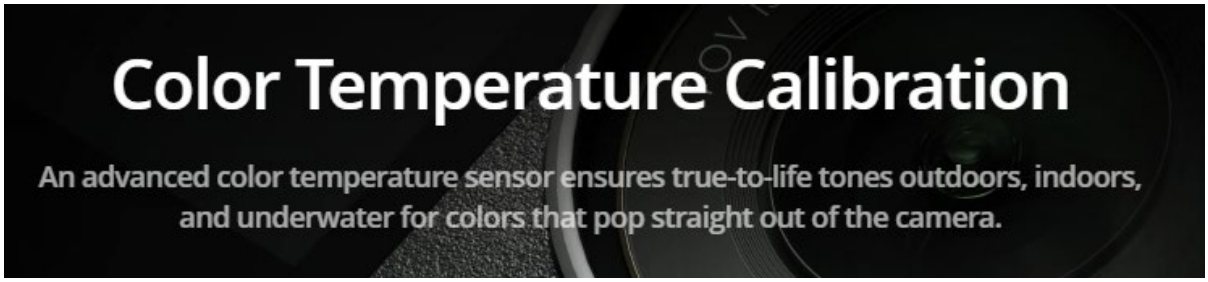
71. Further, upon information and belief, Defendants operate user agents, proxy servers, registrar servers, redirect servers, session border controllers, gateways, and/or other servers or computers that support and interact with DJI's Android, iOS, and controller apps, Camera Drone Products, and Handheld Camera Products (the "Backend System"). DJI's Camera Drone Products, Handheld Camera Products, Camera Drone Applications, Handheld Camera Applications, and Backend System are collectively referred to as the "Accused Products" or "Accused System."

Analysis of Accused DJI Handheld Camera Products

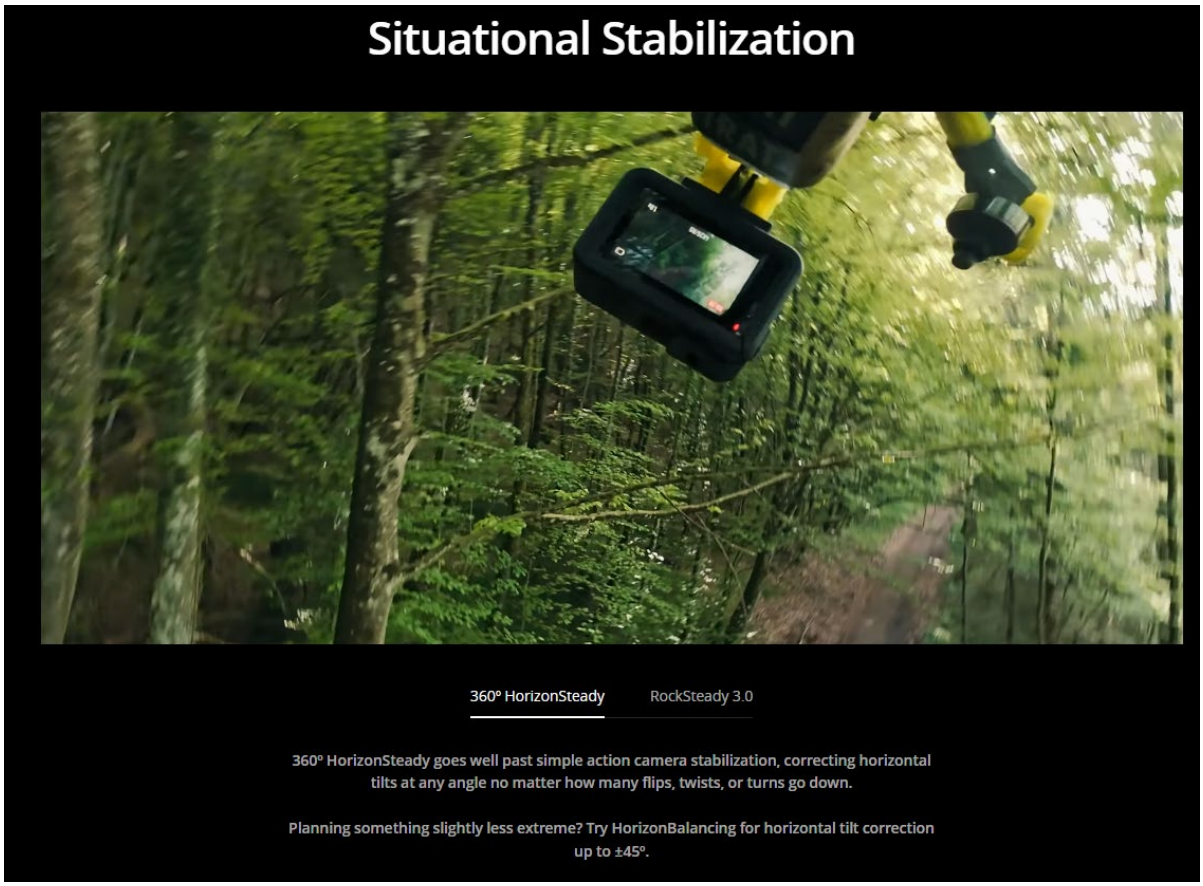
72. The DJI Osmo Action 4 is a non-limiting example of an Accused Product that infringes at least claim 3 of the '694 Patent, claim 11 of the '954 Patent, and claim 1 of the '983 Patent. For example, the DJI Osmo Action 4 is a hands-free compact portable digital video camera that allows users to shoot videos from multiple points of view. The Osmo Action 4 and its DJI accessories (the "DJI Osmo Pocket 4 System") form a digital video camera system.

73. The Osmo Action 4 has a 155° Field of View lens, a 1/1/3-inch image sensor, and a camera processor. For example, the Osmo Action 4's image sensor produces real time video image data of the scene the camera is pointed at. The Osmo Action 4's processor comprises memory as well as a video encoder used to generate at least one encoded video data stream.

74. The Osmo Action 4 also has at least one non-audio data sensor that produces data associated with the video. For example, the Osmo Action 4 has a color temperature sensor and a stabilization sensor.



See e.g., https://www.dji.com/osmo-action-4

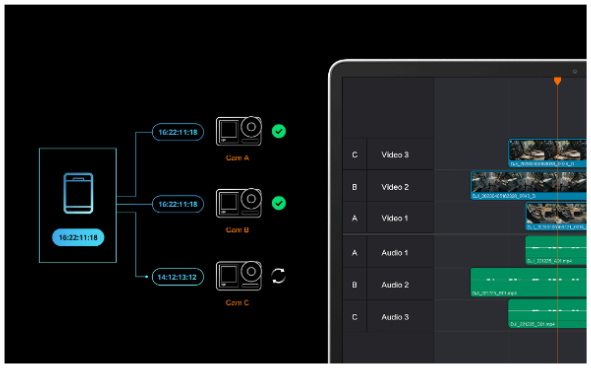


See e.g., https://www.dji.com/osmo-action-4

75. The Osmo Action 4's processor receives the encoded video data stream directly or indirectly from the image sensor as well as data from the color temperature sensor and stabilization sensor. The data from the color temperature sensor and stabilization sensor differ from that of the encoded video data stream. The processor completes a variety of operations with the data from the different sensors. For example, the MP4 files generated by the Osmo Action 4 combines multiple tracks with additional data streams in addition to a track with the encoded video stream, and, upon

information and belief, one or more of these data streams contains timecoded information from the color temperature and/or stabilization sensors, among others. These additional tracks are different from the track containing the encoded video data. The combined MP4 stream is stored in the Osmo Action 4's memory and may be accessed by the user.

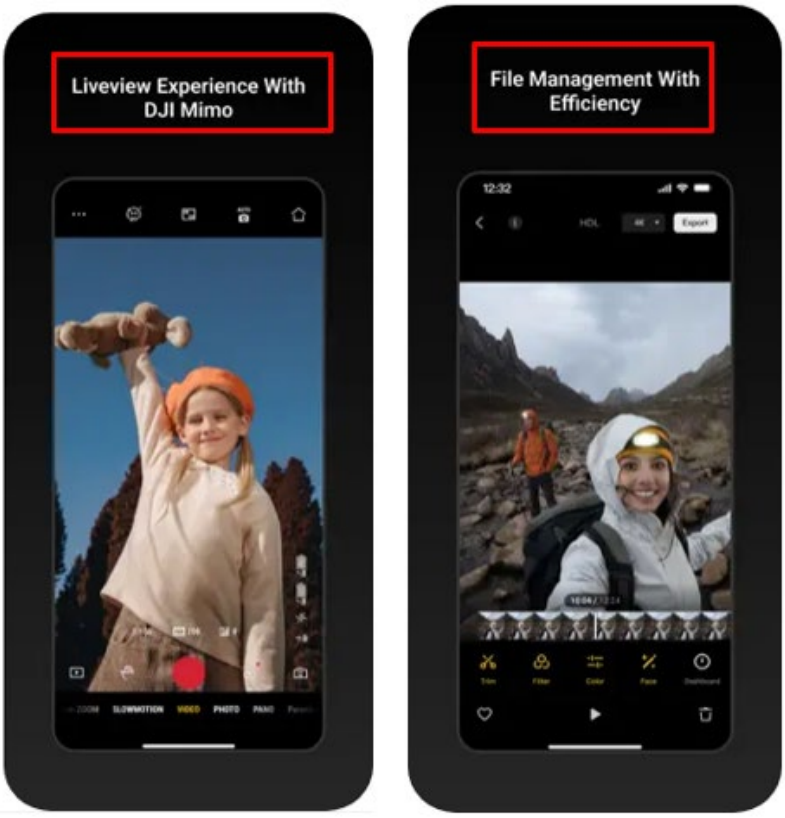
76. The Osmo Action 4's processor is also configured to generate time synchronizing data. For example, using the Osmo Action 4's built-in timecode function, a user can synchronize footage from multiple cameras. This timecode function also helps the processor synchronize the various data tracks in the MP4 file.



See e.g., https://www.dji.com/osmo-action-4#47515

77. The Osmo Action 4 has a wireless connection protocol device using the 802.11 a/b/g/n/ac Wi-Fi protocol that is coupled to the processor and allows the Osmo Action 4 to function as a media server that wirelessly transmit videos to (and receive wireless control signals or data signals from) a personal computing device executing the DJI Mimo App. The DJI Mimo App can be installed on Android and Apple phone and tablet products (collectively, a "Personal Device"), and must be installed on the Personal Device to activate and use the Osmo Action 4. The DJI Mimo App wirelessly connects with the Osmo Action 4 and allows for a variety of wireless transmissions between the Osmo Action 4 and the user's Personal Device. For example, the user can

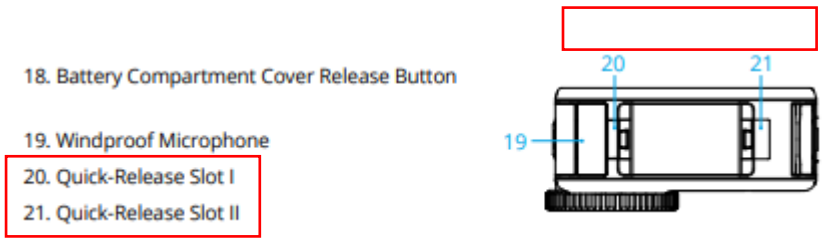
view live video directly from the Osmo Action 4 on their Personal Device. In this situation, the wireless protocol on the Osmo Action 4 directly transmits live video data from the Osmo Action 4 to the user's Personal Device. The DJI Mimo App also allows the Osmo Action 4 to transmit captured videos and photos directly to the user's Personal Device. The DJI Mimo App allows the user to control the camera movements and camera parameters while they use the Osmo Action 4. For example, the user can enter a command on the Mimo App (such as to zoom in on a target), and the app will wirelessly direct the Osmo Action 4 to follow that command. The DJI Mimo App is also configured to store the encoded video data stream in the cached memory and locally in the Personal Device's storage.



See e.g., https://apps.apple.com/us/app/dji-mimo/id1431720653

78. The DJI Osmo Action 4 System includes a variety of DJI mounts. The Osmo Action 4 has multiple Quick-Release Slots coupled to the Osmo Action 4 that serve as a mounting interface, which is coupled to one of the DJI mounts, and enables it to be

mounted on the user of the Osmo Action 4. For example, a user can attach the Osmo Action 4 to their person using any one of the following DJI mounts: the Osmo Action 360° Wrist Strap, the Osmo Action Hanging Neck Mount, the Osmo Action Chest Strap Mount, or the Osmo Action Bite Mount. Additionally, the Osmo Action 4 can be mounted on the user's vehicle. For example, the user can attach the Osmo Action 4 to the user's vehicle using the Osmo Action Handlebar Mount or the Osmo Action Suction Cup Mount. The Osmo Action 4 can also attach to the user's garment, for example, via the Osmo Action Helmet Chin Mount. The DJI mounts are configured for manual adjustment of the video camera. For example, using the screws on the mounts, the user can manipulate the direction and angle the camera is facing.



See e.g., DJI Osmo Action 4 User Manual v1.0 EN at 5 (available at https://dl.djicdn.com/downloads/DJI_Osmo_Action_4/UM/20230802/DJI_Osmo_Action_4_User_Manual_v1.0_en.pdf).

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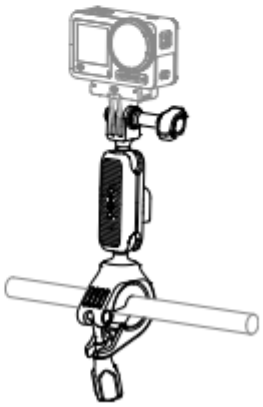
Osmo Action Chest Strap Mount	
Osmo Action Handlebar Mount	

See e.g., DJI Osmo Action 4 User Manual v1.0 EN at 31.

79. The Osmo Action 4's camera processor is configured to generate two videos based on the scene that the camera is viewing. For example, the first view is a HD live view, which is the lower quality view. The second view is 4K video recording, which is a higher resolution and quality than the HD live view. The DJI Osmo Action 4's wireless connection protocol device wirelessly sends the HD live view to the DJI Mimo App on the user's phone. This live view displays in the Mimo App.

Highlights:
1. Supports HD live view and 4K video recording.
2. Controls Osmo Pocket, Osmo Action or Osmo Mobile 3 via Bluetooth or Wi-Fi.
3. My Story video templates designed by professionals allow you to edit your videos in a single tap.
4. Precise face identification and real-time Beautify mode enhances photos and videos instantly.
5. Upload and share videos with just a tap.
6. Advanced video editing functions: Trim and split clips, adjust playback speed, reverse, and more.
7. Tune image quality to meet your needs: Brightness, saturation, contrast, color temperature, vignette, and sharpness.
8. Multiple filters, music templates, and watermark stickers finish your videos with a unique flair.

See e.g., https://apps.apple.com/us/app/dji-mimo/id1431720653

80. The Osmo Action 4's HD live view is a preview the Osmo Action 4's current view and a preview of the higher quality video that the Osmo Action 4 can record. The user can use this preview to manually adjust the angle of the camera. For example, the user can manually adjust the angle of the video camera based on the HD live view.

81. The user may control the DJI Osmo Action 4 using the control signals generated by the DJI Mimo App on the user's Personal Device based on the inputs received from the user. These signals include, but are not limited to:

82. Frame Alignment - The user can recenter the gimbal to align the frame with a subject. The user can also swipe on the screen to rotate the gimbal and align the frame.

83. Remote File Access - The user can log into the DJI Mimo App, wirelessly connect it to their Osmo Action 4, and remotely access the files the Osmo Action 4 created.

84. Data Acquisition and Resolution - The user can use the preview on the DJI Mimo App to acquire key data like Wi-Fi strength, Osmo Action 4 battery level, and available storage in the Osmo Action 4's microSD card (for example, identified in the subsequent picture as #2, #3, #4). The user can also modify the recorded video's resolution (for example, identified in the subsequent picture as #5).

85. Color/Lighting/Audio - The DJI Mimo App allows a user to send control signals from the user's phone to the DJI Osmo Action 4. These settings include the ability to manipulate the following settings (for example, identified in the subsequent picture as #9): the color of the displayed and recorded video (by manipulating the White Balance and the logarithmic color profile the Osmo Action 4 shoots in); the lighting of the displayed and recorded video (by manipulating the exposure, which changes the amount of light the processor processes); and the audio settings of the

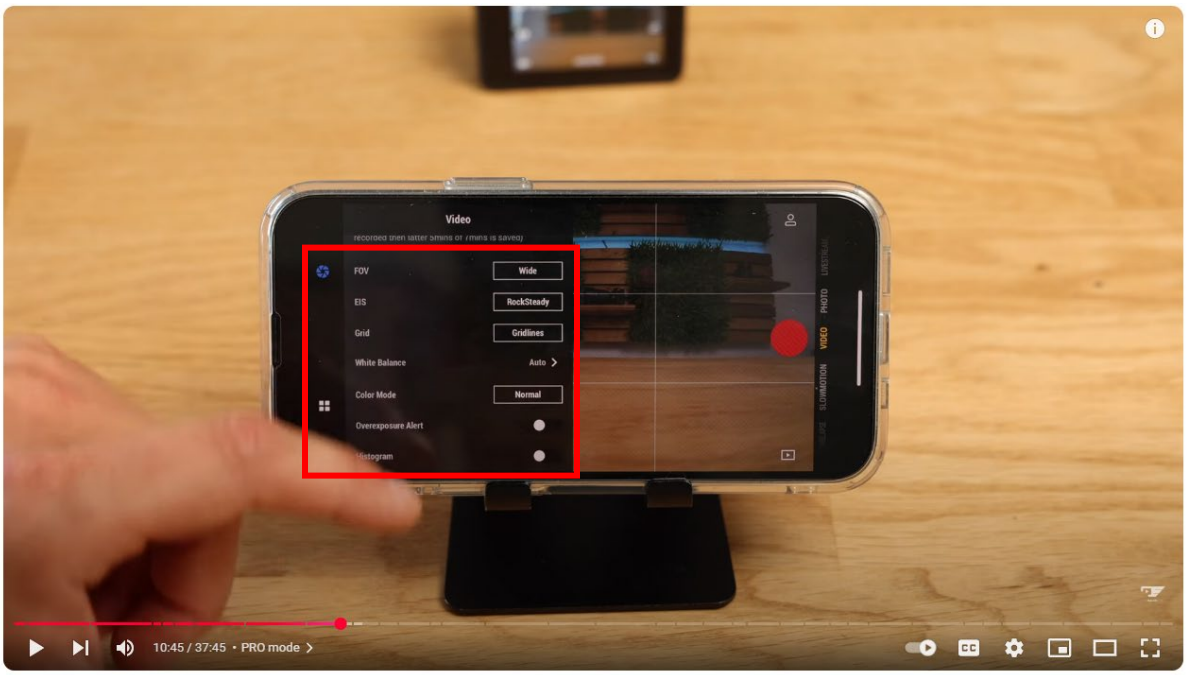
displayed and recorded video. Exemplary audio settings include changing the direction of the audio, reducing wind noise, and setting the audio type.

86. Synchronization of Multiple Cameras - The DJI Osmo Action 4 has a built-in timecode function that allows for the synchronization of multiple cameras.

Camera View

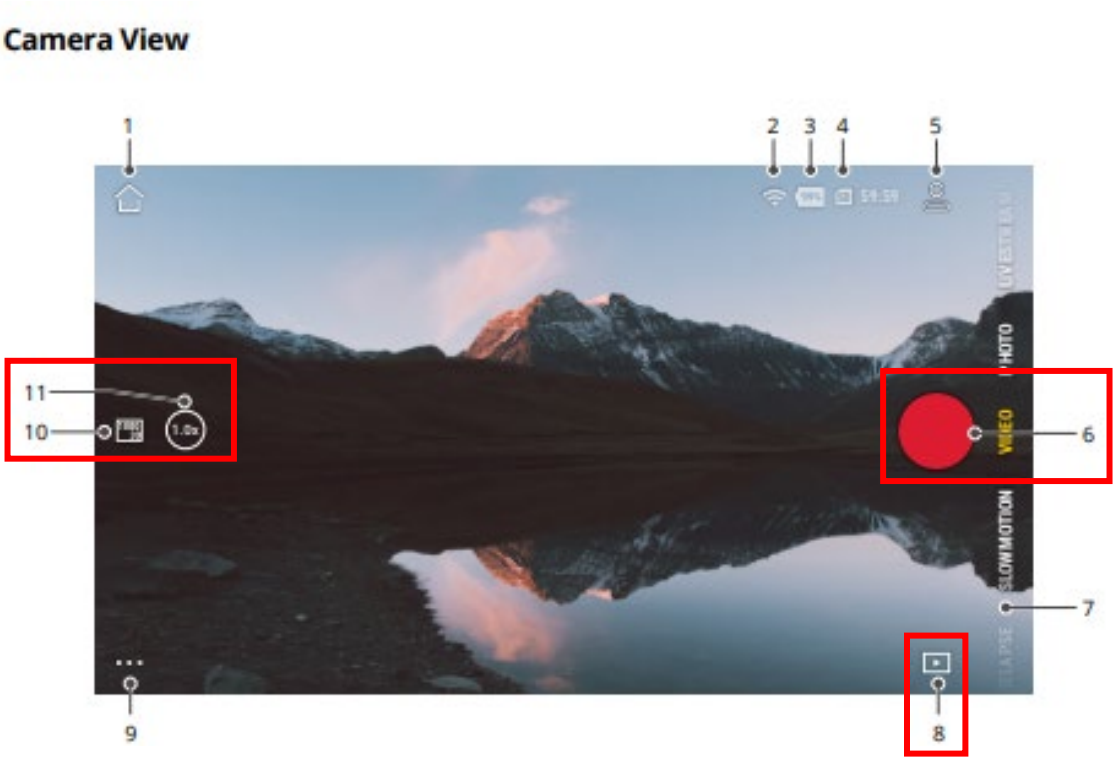
2. **Wi-Fi**
   : displays Wi-Fi connection.
3. **Battery Level**
   : displays the current battery level of Osmo Action 4.
4. **microSD Card Information**
   59:59 : displays either the remaining number of photos that can be taken or the video duration that can be recorded according to the current shooting mode.
5. **Custom Mode**
   : tap and tap to save the current configuration as a custom mode. Save the shooting parameters in the custom mode, which can then be used directly to shoot similar scenes. Users can save up to five custom modes.
9. **Settings**
   ••• : Set the selected shooting mode as Basic or Pro mode. More settings become available once Pro is enabled, including FOV, Format, Exposure and White Balance. Various parameters can be set when using different shooting modes.
10. **Shooting Parameters**
    : Displays the parameters of the current shooting mode. Tap to set the parameters.
11. **Zoom**
    : Displays the current zoom ratio. Place two fingers on the screen and move them apart to zoom in or pinch them to zoom out.

See e.g., DJI Osmo Action 4 User Manual v1.0 EN at 25, 26.



See e.g., https://www.youtube.com/watch?v=uvau3flNEVQ

87. Prior to recording, the user can modify video quality or capture settings in the DJI Mimo App HD live view on their Personal Device (for example, identified in the subsequent picture as #10 and #11). Once the control signals are received from the Personal Device, the DJI Osmo Action 4's processor will adjust the DJI Osmo Action 4's settings in response to the modifications the user made on the DJI Mimo App. The user can also command the DJI Osmo Action 4 to record the higher quality video on the Osmo Action 4's microSD card by clicking the red record button in DJI Mimo App's HD live view (for example, identified in the subsequent picture as #6). The user can view that higher quality video in an MP4 format either on the Osmo Action 4, or on the user's Personal Device via the DJI Mimo App (for example, identified in the subsequent picture as #8).



6. **Shutter/Record Button**
● : tap to take a photo or to start or stop recording a video.

8. **Playback**
▶ : tap to preview photos and videos as soon as they are captured.

9. **Settings**
••• : set the selected shooting mode as Basic or Pro mode. More settings become available once Pro is enabled, including FOV, Format, Exposure and White Balance. Various parameters can be set when using different shooting modes.

10. **Shooting Parameters**
1080 30 : displays the parameters of the current shooting mode. Tap to set the parameters.

11. **Zoom**
1.0x : displays the current zoom ratio. Place two fingers on the screen and move them apart to zoom in or pinch together to zoom out.

See e.g., DJI Osmo Action 4 User Manual v1.0 EN at 25, 26.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 8,896,694

88. The allegations set forth in the foregoing paragraphs are hereby realleged and incorporated herein by reference.

89. In violation of 35 U.S.C. § 271(a), Defendants have directly infringed and continue to directly infringe, both literally and/or under the doctrine of equivalents, the '694 Patent by making, using, offering for sale, selling, and/or importing Accused Camera Drone Products in the United States, including within this Judicial District, that infringe at least claim 1 of the '694 Patent without authority of Contour, and by making, using, offering for sale, selling, and/or importing Accused Handheld Camera Products in the United States, including within this Judicial District, that infringe at least claim 3 of the '694 Patent without authority of Contour.

90. In violation of 35 U.S.C. § 271(b), Defendants have induced their customers and/or end users and continue to induce their customers and/or end users to infringe, both literally and/or under the doctrine of equivalents, at least claims 1 and 3 of the '694 Patent by providing instructions via their website(s), product manuals, user manuals, product support, or through other documents that induce their customers and/or end users to directly infringe the '694 Patent and by making, using, offering for sale, selling, and/or importing devices in the United States, including within this Judicial District, that infringe at least claims 1 and 3 of the '694 Patent without the authority of Contour. *See e.g.*, https://www.dji.com/inspire-3; https://dl.djicdn.com/downloads/inspire_3/20241016UM/DJI_Inspire_3_User_Manual_V3.0_EN.pdf; *see also*, https://www.dji.com/osmo-action-4; https://dl.djicdn.com/downloads/DJI_Osmo_Action_4/UM/20230802/DJI_Osmo_Action_4_User_Manual_v1.0_en.pdf.

91. In violation of 35 U.S.C. § 271(c), Defendants have actively contributed to direct infringement, and actively contribute to direct infringement of the '694 Patent by making, using, offering for sale, selling, and/or importing components (including, but not limited to, the Accused Camera Drone Products and Accused Camera Drone Applications that are part of at least claim 1, and the Accused Handheld Camera Products and Accused Handheld Camera Applications that are part of at least claim 3 of the '694 Patent), into the United States, including within this Judicial District, that

infringe at least claims 1 and 3 of the '694 Patent, respectively, without the authority of Contour. These components have no substantial non-infringing use and are especially made or especially adapted for use in a direct infringement of the '694 Patent.

92. Defendants have actively contributed to direct infringement, and actively contribute to direct infringement of the '694 Patent by others, either literally or under the doctrine of equivalents, by selling the Accused Products and by providing and/or making available for download the Camera Drone Applications for use with the Accused Camera Drone Products, and the Handheld Camera Applications for use with the Accused Handheld Camera Products.

93. The Accused Camera Drone Products and Accused Handheld Camera Products with wireless capability are especially made and/or especially adapted for use with the claimed invention of at least claims 1 and 3 of the '694 Patent, respectively, and are not a staple article or commodity of commerce suitable for substantial non-infringing use.

94. The Camera Drone Applications and the Handheld Camera Applications are especially made and/or especially adapted for use with the claimed invention of at least claims 1 and 3 of the '694 Patent, respectively, and are not a staple article or commodity of commerce suitable for substantial non-infringing use. For example, the Osmo Action 4 cannot be used without first installing the DJI Mimo App.

Activating Osmo Action 4

The DJI Mimo app is required for activation when using Osmo Action 4 for the first time. Follow the steps below to activate.

1. Press and hold the Quick Switch Button to power on.
2. Enable Wi-Fi and Bluetooth on the mobile device.
3. Launch DJI Mimo, tap [camera], and follow the instructions to activate Osmo Action 4.

See e.g., DJI Osmo Action 4 User Manual v1.0 EN at 10.

95. Any non-infringing uses of the Accused Camera Drone Products with wireless capability in combination with their respective Camera Drone Application(s) or any non-infringing uses of the Accused Handheld Camera Products with wireless

capability in combination with the Handheld Camera Applications would be unusual, far-fetched, illusory, impractical, occasional, aberrant, or experimental.

96. Defendants have had knowledge of the '694 Patent and their infringement since at least March 4, 2025.

97. Unless enjoined by this Court, Defendants will continue to infringe the '694 Patent.

98. Because of Defendants infringing activities, Contour has suffered damages and will continue to suffer damages in the future.

COUNT 2: INFRINGEMENT OF U.S. PATENT NO. 8,890,954

99. The allegations set forth in the foregoing paragraphs are hereby realleged and incorporated herein by reference.

100. In violation of 35 U.S.C. § 271(a), Defendants have directly infringed and continue to directly infringe, both literally and/or under the doctrine of equivalents, the '954 Patent by making, using, offering for sale, selling, and/or importing devices in the United States, including within this Judicial District, that infringe at least claim 11 of the '954 Patent without the authorization of Contour.

101. In violation of 35 U.S.C. § 271(b), Defendants have induced their customers and/or end users and continue to induce their customers and/or end users to infringe, both literally and/or under the doctrine of equivalents, at least claim 11 of the '954 Patent by providing instructions via their website(s), product manuals, user manuals, product support, or through other documents that induce their customers to directly infringe the '954 Patent and by making, using, offering for sale, selling, and/or importing devices in the United States, including within this Judicial District, that infringe at least claim 11 of the '954 Patent without the authority of Contour. *See e.g.*, https://www.dji.com/osmo-action-4; https://dl.djicdn.com/downloads/DJI_Osmo_Action_4/UM/20230802/DJI_Osmo_Action_4_User_Manual_v1.0_en.pdf.

102. In violation of 35 U.S.C. § 271(c), Defendants have actively contributed to direct infringement, and actively contribute to direct infringement of the ’954 Patent by making, using, offering for sale, selling, and/or importing components (including, but not limited to, the Accused Products that are part of at least claim 11 of the ’954 Patent), into the United States, including within this Judicial District, that infringe at least claim 11 of the ’954 Patent without the authority of Contour. These components have no substantial non-infringing use and are especially made or especially adapted for use in a direct infringement of the ’954 Patent.

103. Defendants have actively contributed to direct infringement, and actively contribute to direct infringement of the ’954 Patent by others, either literally or under the doctrine of equivalents, by selling the Accused Products and by providing and/or making available for download the Camera Drone Applications for use with the Accused Camera Drone Products, and the Handheld Camera Applications for use with the Accused Handheld Camera Products.

104. The Accused Camera Drone Products and Accused Handheld Camera Products with wireless capability are especially made and/or especially adapted for use with the claimed invention of at least claim 11 of the ’954 Patent and are not a staple article or commodity of commerce suitable for substantial non-infringing use.

105. The Camera Drone Applications and Handheld Camera Applications are especially made and/or especially adapted for use with the claimed invention of at least Claim 11 of the ’954 Patent and are not a staple article or commodity of commerce suitable for substantial non-infringing use. For example, the Osmo Action 4 cannot be used without first installing the DJI Mimo App.

Activating Osmo Action 4

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1. Press and hold the Quick Switch Button to power on.
2. Enable Wi-Fi and Bluetooth on the mobile device.
3. Launch DJI Mimo, tap  , and follow the instructions to activate Osmo Action 4.

See e.g., DJI Osmo Action 4 User Manual v1.0 EN at 10.

106. Any non-infringing uses of the Accused Camera Drone Products with wireless capability in combination with their respective Camera Drone Application(s) or any non-infringing uses of the Accused Handheld Camera Products with wireless capability in combination with the Handheld Camera Applications would be unusual, far-fetched, illusory, impractical, occasional, aberrant, or experimental.

107. Defendants have had knowledge of the '954 Patent and their infringement since at least March 4, 2025.

108. Unless enjoined by this Court, Defendants will continue to infringe the '954 Patent.

109. Because of Defendants' infringing activities, Contour has suffered damages and will continue to suffer damages in the future.

COUNT 3: INFRINGEMENT OF U.S. PATENT NO. 12,206,983

110. The allegations set forth in the foregoing paragraphs are hereby realleged and incorporated herein by reference.

111. In violation of 35 U.S.C. § 271(a), Defendants have directly infringed and continue to directly infringe, both literally and/or under the doctrine of equivalents, the '983 Patent by making, using, offering for sale, selling, and/or importing devices in the United States, including within this Judicial District, that infringe at least claim 1 of the '983 Patent without the authorization of Contour.

112. In violation of 35 U.S.C. § 271(b), Defendants have induced their customers and/or end users and continue to induce their customers and/or end users to infringe, both literally and/or under the doctrine of equivalents, at least claim 1 of the '983 Patent by providing instructions via its website(s), product manuals, user manuals, product support, or through other documents that induce their customers to directly infringe the '983 Patent and by making, using, offering for sale, selling, and/or importing device in the United States, including within this Judicial District, that

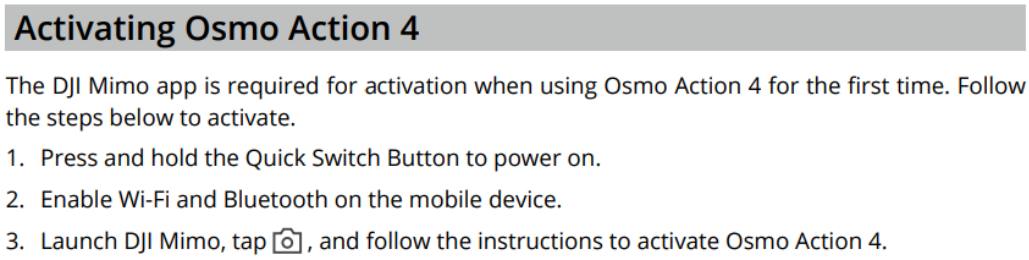
infringe at least claim 1 of the '983 Patent without the authority of Contour. *See e.g.*, https://www.dji.com/osmo-action-4; https://dl.djicdn.com/downloads/DJI_Osmo_Action_4/UM/20230802/DJI_Osmo_Action_4_User_Manual_v1.0_en.pdf.

113. In violation of 35 U.S.C. § 271(c), Defendants have actively contributed to direct infringement, and actively contribute to direct infringement of the '983 Patent by making, using, offering for sale, selling, and/or importing components (including, but not limited to, the Accused Products that are part of at least claim 1 of the '983 Patent), into the United States, including within this Judicial District, that infringe at least claim 1 of the '983 Patent without the authority of Contour. These components have no substantial non-infringing use and are especially made or especially adapted for use in a direct infringement of the '983 Patent.

114. Defendants have actively contributed to direct infringement, and actively contribute to direct infringement of the '983 Patent by others, either literally or under the doctrine of equivalents, by selling the Accused Products and by providing and/or making available for download the Camera Drone Applications for use with the Accused Camera Drone Products, and the Handheld Camera Applications for use with the Accused Handheld Camera Products.

115. The Accused Camera Drone Products and Accused Handheld Camera Products with wireless capability are especially made and/or especially adapted for use with the claimed invention of at least claim 1 of the '983 Patent and are not a staple article or commodity of commerce suitable for substantial non-infringing use.

116. The Camera Drone Applications and Handheld Camera Applications are especially made and/or especially adapted for use with the claimed invention of at least claim 1 of the '983 Patent and are not a staple article or commodity of commerce suitable for substantial non-infringing use. For example, the Osmo Action 4 cannot be used without first installing the DJI Mimo App.



Activating Osmo Action 4

The DJI Mimo app is required for activation when using Osmo Action 4 for the first time. Follow the steps below to activate.

1. Press and hold the Quick Switch Button to power on.
2. Enable Wi-Fi and Bluetooth on the mobile device.
3. Launch DJI Mimo, tap , and follow the instructions to activate Osmo Action 4.

See e.g., DJI Osmo Action 4 User Manual v1.0 EN at 10.

117. Any non-infringing uses of the Accused Camera Drone Products with wireless capability in combination with their respective Camera Drone Application(s) or any non-infringing uses of the Accused Handheld Camera Products with wireless capability in combination with the Handheld Camera Applications would be unusual, far-fetched, illusory, impractical, occasional, aberrant, or experimental.

118. Defendants have had knowledge of the '983 Patent and their infringement since at least March 4, 2025.

119. Unless enjoined by this Court, Defendants will continue to infringe the '983 Patent.

120. Because of Defendants' infringing activities, Contour has suffered damages and will continue to suffer damages in the future.

PRAYER FOR RELIEF

Contour respectfully requests that this Court enter judgment in Contour's favor and against Defendants as follows:

1. That Defendants have directly and indirectly infringed at least one claim from each of the Asserted Patents;
2. That Defendants' infringement has been willful;
3. An award of damages to be paid by Defendants adequate to compensate Contour for Defendants' infringement of the Asserted Patents and in no event less than a reasonable royalty together with interests and costs

4. An award of treble damages in accordance with 35 U.S.C. § 284;

5. An order enjoining Defendants and its officers, agents, servants, employees, users, attorneys, and all those persons in active concert or participation with Defendants from the acts described in this Complaint;

6. A declaration that this case is exceptional under 35 U.S.C. § 285, and an award of Contour's reasonable attorneys' fees; an

7. Any other relief at law or in equity as the Court deems just and proper.

Dated: March 12, 2025

Respectfully submitted,

CALL & JENSEN
A Professional Corporation
Aaron L. Renfro
Sameer Hussain

By: */s/Aaron L. Renfro*
Aaron L. Renfro

Attorneys for Plaintiff
CONTOUR IP HOLDING, LLC.

DEMAND FOR JURY TRIAL

8. Pursuant to Fed. R. Civ. P. 38(b) and L.R. 38-1, Contour hereby demands a trial by jury on all issues so triable.

Dated: March 12, 2025

Respectfully submitted,

CALL & JENSEN
A Professional Corporation
Aaron L. Renfro
Sameer Hussain

By: */s/Aaron L. Renfro*
Aaron L. Renfro

Attorneys for Plaintiff
CONTOUR IP HOLDING, LLC.